

TSD File Inventory Index

Date: December 5, 2000

Initial: CMH/MS/MS

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Facility Identification Number: <u>MD 057676 124</u>			
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Note: Transmittal Letter to Be Included with Reports.

Comments: _____

James M Landis, Jr.
Senior Research Chemist



Analytical

Henkel Corporation
32100 Stephenson Highway
Madison Heights, MI 48071
Phone: (248) 577-2217
Fax: (248) 583-2976
Voicemail: (800) 314-3377 (x2217)
E-mail: jim.landis@henkel-americas.com



FEB 16 2000

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Budnik
Regulatory Affairs Manager
Henkel Surface Technologies
32100 Stephenson Highway
Madison Heights, Michigan 48071

Re: Letter of Acknowledgment
Henkel Surface Technologies
U.S. EPA ID No.: MID 057 676 124

Dear Mr. Budnik:

On December 10, 1999, the United States Environmental Protection Agency (U.S. EPA) issued Henkel Surface Technologies a Notice of Violation (NOV) which identified violations of Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and Subtitle C of the Federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended. Specifically Michigan Administrative Code (MAC) Rule 299.9304(d) and Rule 299.9813 and Title 40 of the Code of Federal Regulations, Part 279, Section 54, (40 C.F.R. §279.54). U.S. EPA received your January 18, 2000, response to that NOV. This letter is to inform you that U.S. EPA has reviewed your response and determined that no further enforcement action will be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the NREPA and RCRA, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Michigan Department of Environmental Quality in the future.

-2-

If you have any questions and/or concerns regarding this matter, please contact Ms. Diane Sharrow, of my staff, at (312)886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: D. Sharrow, USEPA
Section File
Branch File

LEGEND:DE-9J:Sharrow:DMS:6-6199:Houghton_ack.ltr:020400

DEC 07 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George J. Beyer, Manager
Henkel Surface Technologies
32100 Stephenson Highway
Madison Heights, Michigan 48071

DE-9J

Re: NOTICE OF VIOLATION
Henkel Surface Technologies
U.S. EPA ID. NO. MID 057 676 124

Dear Mr. Beyer:

On September 21, 1999, the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Environmental Quality (DEQ) conducted a joint Compliance Evaluation Inspection (CEI) of the Henkel Surface Technologies site located in Madison Heights, Michigan. The purpose of the CEI was to evaluate the compliance of Henkel Surface Technologies with Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these Acts. A copy of the completed CEI checklists can be obtained by contacting Ms. Diane Sharrow at the U.S. EPA, or Mr. Mark Daniels at the DEQ.

Based on a review of the manifests and other records made available to U.S. EPA and DEQ during the CEI, the inspectors determined that Henkel Surface Technologies is a large quantity generator, because it generated over 1000 kilograms of hazardous waste in at least one month. In addition, U.S. EPA and DEQ found that Henkel Surface Technologies, Madison Heights, Michigan, had violated the following rules:

Rule 307(1) (a/k/a MAC R. 299.9307(1)) - Henkel Surface Technologies had copies of the waste analysis for the non-hazardous filter press sludge, but did not have analytical data for waste streams such as obsolete and off-specification products, ignitable waste solvents and paints from research and development, lab packs and waste water treatment heavy metal reduction precipitation. You must submit copies of your waste evaluations for the past three years.

Rules 306 (1), (1)(b), (1)(c) (a/k/a MAC R. 299.9306 (1), (1)(b), (1)(c)) - Henkel Surface Technologies does not have a permit or interim status and failed to have all containers (3 in the storage area and 2 in the satellite accumulation area) marked with: the accumulation date; the words hazardous waste; and the hazardous waste number. It was impossible to determine whether you had exceeded the 55-gallon limit in the satellite accumulation area and whether the drums had been moved to the storage area when required. In addition, it was impossible to determine if more than 90 days had elapsed since the date the containers in both areas should have been marked with an accumulation date, because the weekly inspection logs or reports for both storage areas for the past three years had not been completed or were not available. The above violations are almost identical to the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306. You must also submit copies of the weekly inspection logs for the past three years.

Rule 306 (1)(a) (a/k/a MAC R. 299.9306 (1)(a)) [40 CFR 262.34(a)(1) and 265.171, 265.172, 265.173(a) and (b), 265.174, 265.176 and 265.177] - Henkel Surface Technologies does not have a permit or interim status. The storage area was in disarray. It was difficult to access the storage area, view the containers and read the labels. Containers were stored on and near broken pallets that hindered the inspectors' movement and access. It was impossible to determine for the majority of the containers which containers held hazardous waste and which containers held non-hazardous waste, and whether the waste and containers were compatible. There was one open, unlabeled pail. There was one drum with no waste codes. There were two drums with no start dates. There were no records of inspection for the past three years. Once again, the above violations are almost identical to the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306 (1)(a) (which references 40 CFR 262 and 265). You must also submit copies of the weekly inspection logs for the past three years.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.16] - Henkel Surface Technologies personnel training records did not contain the job titles, job descriptions and the name of each employee filling each job. Your staff indicated that all laboratory and maintenance staff are trained, but there were no specific records that listed job titles, job descriptions and the name of each employee filling the job. You must submit this documentation.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.32] - Henkel Surface Technologies did not have documentation that an adequate volume of water or foam for fire control, was available. You must submit documentation that this requirement has been met.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.34(a) and (b)] - Henkel Surface Technologies did not have an internal alarm or communication device available in the satellite accumulation area. You must provide documentation that internal alarms have been installed and this violation has been corrected.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.35] - Henkel Surface Technologies did not have adequate aisle space in the storage area for the unobstructed movement of personnel and emergency equipment. You must submit documentation that this has been corrected and that adequate aisle space will be maintained at **all** times.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.37(a) and (b) and 265.53 © and (d)] - Henkel Surface Technologies had no description of arrangements made with local authorities for emergency response and services, and the Contingency Plan did not contain the addresses of the emergency coordinators. You must submit documentation of your arrangements with local authorities, and that you have included the addresses of the emergency coordinators in the Contingency Plan.

Rule 205 (a/ka/ MAC R. 299.9205) [40 CFR 273] - Henkel Surface Technologies staff were uncertain about how paint filters, electric lamps and waste devices containing mercury were characterized and managed. You must submit documentation regarding the characterization and management of these wastes.

This Notice of Violation does not preclude, nor limit, the U.S. EPA's or the DEQ's ability to initiate any other enforcement action, under Federal or State law, as deemed appropriate. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may, among other things, issue an Order assessing a civil penalty for any past, or current, violation requiring

compliance immediately or within a specified time period. Although this letter is not such an Order, Henkel Surface Technologies should take prompt action to correct all violations and come into compliance if it has not already done so.

You are hereby requested to submit a written response, that includes the documentation listed above, to the U.S. EPA no later than 30 days from the certified receipt of this letter. The written response should document all past and current actions taken to establish compliance with the above requirements.

If you have any questions or concerns regarding this matter, please contact Ms. Sharrow, of my staff, at 312-886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: Compliance File
Section File
Author
Paul Little

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 CHIEF	ECAB BRANCH CHIEF
<i>DDIS</i> <i>12/3/99</i>	<i>WJ</i> <i>12/3/99</i>	

DE-9J:DSHARROW:12/1/99 F:\USER\DSHARROW\Henkel.NOV

January 18, 2000

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement & Compliance Assurance Branch
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Attention: DE-9J:

This letter is Henkel Surface Technologies (HST) response to the Notice of Violation (NOV) issued by the Region 5, United States Environmental Protection Agency (U.S. EPA) as a result of a September 21, 1999 Compliance Evaluation Inspection conducted jointly by the U. S. EPA and the Michigan Department of Environmental Quality (MDEQ) at the HST facility located in Madison Heights, Michigan. This facility is the world headquarters for HST and contains Research & Development, Sales/Marketing and Administrative offices.

Before responding to the items in your letter, it should first be pointed out that on the day of the inspection, our waste contractor was on site identifying, sorting and placing obsolete laboratory chemicals into soft sack bulk containers and 55 gallon open top drums. The very nature of this type of operation, leads to the appearance of disorganization and clutter in the waste storage area. At the conclusion of this operation the storage area is always returned to its normal, neat and organized appearance. This activity was reported to both inspectors and they acknowledged that they were aware of it and that it contributed to the clutter in the waste area during the inspection. However, there is no mention in the NOV that this lab packing activity was occurring during the course of the inspection or that it contributed to the appearance of the area.

To address the rule violations noted, we numbered and summarized the inspectors' findings and put them into a table with action plans, responsibility and completion dates. This table is attached to this letter.

The first finding states that the facility did not have analytical data for our various waste streams on site. (It should be noted that in this finding the non-hazardous filter press sludge and the waste water treatment heavy metal reduction precipitation waste are one and the same and that analytical data was available on site for this waste stream.) Per our January 7, 2000 telephone conversation with Ms. Diane Sharrow of your staff, we are sending to you with this letter a representative sampling of the analytical data. We also have obtained all analytical data for all waste streams from our waste contractor and will maintain them on site.

The second finding is that we failed to have all containers in the waste storage area and the satellite accumulation area clearly marked with the words hazardous waste, the accumulation date and the hazardous waste number. You requested documentation that we are meeting the Large Quantity Generator (LQG) storage requirements and copies of the weekly waste storage area inspection logs for the past three years. Our response is that we only created the permanent hazardous waste storage area in June of 1999 and thus only have weekly inspections since that time. Prior to this we shipped materials out whenever we had a lab pack day and obsolete chemicals were brought down to the loading dock area from the various labs. Drums from the satellite area would also be brought to the loading dock for shipment with the lab packs no matter how full they were. Housekeeping and facility inspections were conducted at least quarterly and sometimes monthly for all areas of the building. As our operations at this facility have expanded and more personnel are housed here than in the past this type of operation became too disruptive, took too much space and interfered with other building operations. Therefore, a permanent waste storage area was created where this activity could take place. We have also increased the frequency of lab pack days and shipment from every eleven weeks to every 6 weeks to better manage the materials and confine the lab pack operations to a smaller area. We are forwarding a sampling of the weekly inspections from June, 1999 to the present, a sampling of the monthly facility and housekeeping inspections from 1997 through 1999 and a modified and updated Hazardous Waste Management procedure. We are including a picture of a drum with a properly marked up label and photos of the satellite accumulation and hazardous waste storage areas, depicting proper aisle space and storage techniques.

The third finding is that the storage area was in disarray and difficult to access. Again, I point out that the previously mentioned lab pack activity was on going in the area and contributed to this finding. The drums noted in your letter with either no accumulation start date or no label were drums that were being actively used for the lab pack activities. Our response to this finding is the same as for the second finding listed above.

The fourth finding in your letter was that we did not have specific records that showed in writing what the waste handling duties were for different job titles. We have created a list of job titles and waste handling duties to be added to our training files and as an appendix to the various job descriptions in our Human Resources department. The list of titles and waste duties with an accompanying memo to our Human Resource department is attached to this letter.

The fifth finding is that the facility did not have documentation available showing that an adequate volume of water for fire control was available. We confirmed via a telephone conversation with the Madison Heights Fire Marshall that the facility fire sprinkler system has an adequate volume and pressure. We are also sending an updated building layout showing fire control measures throughout the facility.

The sixth finding was that the facility did not have an internal alarm or communication device available in the satellite accumulation area. There is now a communication device in this area and a copy of the installation paperwork and a picture of the device are attached to this submittal.

The seventh finding is that the storage area did not have adequate aisle space. Again I point out the lab pack activity that was ongoing at the time of inspection. Our response to this item is the same as for findings #2 and #3.

The eighth item in your letter is that no description of arrangements with local authorities for emergency response and services is available at the site and that the Facility Contingency Plan did not contain the addresses of the emergency coordinators. Attached please find a copy of HST's updated Facility Contingency Plan listing the addresses of all emergency coordinators. In addition, HST has sent copies of the updated plan to local emergency response authorities and requested that they acknowledge receipt and whether or not they would like to receive updates in the future. To date only two agencies have responded in writing, the Oakland County LEPC and William Beaumont Hospital in Royal Oak. Each has responded that they do not want or need the plan or any future updates to it. We are forwarding to you copies of the response letters received, the letters not returned, the return receipt cards for the local agencies that have not responded and a copy of our updated plan.

The last item you list in your letter is that no documentation was available in regard to how paint filters, electric lamps and waste devices containing mercury were managed. In response we set up programs with our waste contractors to manage the paint filters, fluorescent light bulbs and batteries. Copies of the paperwork for these arrangements are attached to this letter.

If you have any questions or concerns regarding this matter please contact me at (248) 585-4322 or Tom Snell, Facility Manager, at (248) 577-2167.

Sincerely,

HENKEL SURFACE TECHNOLOGIES



Robert A. Budnik
Manager, Regulatory Affairs

Attachments

cc:

Mark Daniels, MDEQ, WMD, Livonia District Office (w/o attachments)

Jack Garavanta, HST, Director, Regulatory Affairs & Product Acceptance (w/o attachments)

Bill Keck, HST, Vice President of Operations (w/o attachments)

Gerry Kohlsmith, HST, President (w/o attachments)

Juliette Richter, Henkel Corporation, NA, (w/o attachments)

Tom Snell, HST, Facility Manager

Radison Heights Facility - US EPA/MDEQ Hazardous Waste Inspection; Conducted September 21, 1999

Area	Finding	Recommendation	Action plan	Responsibility	Completion target
1.)	Did not have analytical data for waste streams such as obsolete and off-specification products.	Submit copies of your waste evaluations for the past three years.	Requested information from Dynecol on 12/11/99. Received requested information from Dynecol on 12/22/99.	T. Snell	01/06/00
2.)	Failed to have all containers in the satellite accumulation area marked with: the accumulation date, the words hazardous waste, and the hazardous waste number. No records of inspection for the past three years.	Submit copies of the weekly inspection logs for the past three years and documentation that HST is now meeting all conditions for waste storage as a LQG.	Have weekly inspections for the past six months since hazardous storage area created. Updated procedure to be more specific and reflect changes in responsibility. History of quarterly housekeeping inspections, lab pack date history to address satellite accumulation area and obsolete laboratory chemicals.	T. Snell R. Budnik	01/06/00
3.)	The storage area was in disarray. Broken pallets, unlabeled containers, missing waste codes, and no start dates. No records of inspection for the past three years.	Submit copies of the weekly inspection logs for the past three years and documentation that HST is now meeting all conditions for waste storage as a LQG.	Have weekly inspections for the past six months since hazardous storage area created. Updated procedure to be more specific and reflect changes in responsibility. History of quarterly housekeeping inspections, lab pack date history to address satellite	T. Snell R. Budnik	01/06/00

Madison Heights Facility - US EPA/MDEQ Hazardous Waste Inspection; Conducted September 21, 1999

Area	Finding	Recommendation	Action plan	Responsibility	Completion target
			accumulation area and obsolete laboratory chemicals		
4.)	No specific records found that listed job titles, job descriptions and the name of each employee filling the job.	Submit documentation showing job titles, job descriptions and name of each employee filling a waste handling job.	Add waste handling responsibilities to job descriptions. Create list of Job Titles, and waste handling descriptions and add to job descriptions in Human Resources. Submit list to US EPA.	R. Budnik	01/06/00
5.)	No documentation that an adequate volume of water or foam for fire control was available.	Submit documentation showing that an adequate volume of water is available for fire control.	Get documentation from Fire Marshall on volume and requirements. Blue prints have been updated to show fire control measures throughout the building for submittal with fire marshall data.	T. Snell	01/06/00
6.)	Did not have an internal alarm or communication device available in the satellite accumulation area.	Provide documentation that an internal alarm or communication device has been installed.	Arrangements to install device have been arranged. A picture will be taken upon completion of installation as verification and submitted with a copy of the invoice.	T. Snell	01/06/00
7.)	Did not have adequate aisle space in the storage area for the unobstructed movement of personnel and emergency equipment.	Submit documentation that there is adequate aisle space in the hazardous waste storage area and that it will be maintained at all times.	Aisle space was addressed in the former procedure. The updated procedure has reemphasized the need for adequate aisle space. Personnel will be re-trained on the procedure and any deficiency noted will be emphasized.	T. Snell R. Budnik	01/06/00

Madison Heights Facility - US EPA/MDEQ Hazardous Waste Inspection; Conducted September 21, 1999

Area	Finding	Recommendation	Action plan	Responsibility	Completion target
8.)	No description of arrangements made with local authorities for emergency response and services. The Contingency Plan did not contain the addresses of the emergency coordinators.	Submit documentation of your arrangements with local authorities and that the addresses of the emergency coordinators have been included in the contingency plan.	Changes and updates have been made to procedures and the Emergency Contingency Plan. Copies will be mailed to all pertinent agencies with return receipt requested and return letters to confirm if agency wants to receive future updates.	T. Snell	01/06/00
9.)	No documentation regarding how paint filters, electric lamps and waste devices containing mercury were characterized and managed.	Submit documentation regarding the characterization and management of these wastes.	Dynecol will pick up a paint filter sample and analyze it to determine the proper disposition and a program will be set up to manage this waste. Arrangements have been made with EQ for the management and disposal of fluorescent light bulbs and used batteries.	T. Snell	01/06/00

FINDING NUMBER ONE (1)

- ANALYTICAL DATA (SAMPLES)
- CONTAINER WASTE APPROVAL REPORT

CONTAINER WASTE APPROVAL REPORT

REPORT DATE: 12/17/99

Page 1

REPORT TIME: 8:42 am

APPROVAL #	GENERATOR	WASTE COMMON NAME	UNIT PRICE	PER	EXP. DATE
✓ 102324.6	HENKEL SURFACE TECHNOLOGIES	WASTE SOLID SOAPS		Drum	7/06/00
✓ 102327.6	CC HENKEL SURFACE TECHNOLOGIES	WASTE PAINT SOLVENTS (TOLUENE/MEK)		Drum	3/29/00
✓ 102417.6	HENKEL SURFACE TECHNOLOGIES	WASTE THERMINOL 55		Drum	10/08/00
✓ 103067.6	HENKEL SURFACE TECHNOLOGIES	EPOXY/ACRYLIC WASTE		DRUM	3/29/00
✓ 104376.6	CC HENKEL SURFACE TECHNOLOGIES	AUTOPHORETIC 800 SERIES		DRUM	3/29/00
✓ 104376B.6	CC HENKEL SURFACE TECHNOLOGIES	AUTOPHORETIC 800 SERIES			3/29/00
✓ 105909B.6	HENKEL SURFACE TECHNOLOGIES	P3 HI-LITE 2494 <i>CK EXP. 12-00</i>		PAIL	11/22/00
✓ 106505.6	CC HENKEL SURFACE TECHNOLOGIES	PETROL OILS/PAINT/SOLVENT (MEK/XYLENE/ACETONE)		DRUM	3/29/00
✓ 106521.10	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS		DRUM	4/06/00
✓ 106521.11	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- ISOCYANATE WASTE		DRUM	4/06/00
✓ 106521.12	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON REGULATED LIQUID/SOLID			4/08/00
✓ 106521.17	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON RCRA REGULATED TOXIC LIQUID/SOLIDS		DRUM	4/08/00
✓ 106521.7	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- NON CHLORINATED FLAMMABLE LIQUID		DRUM	4/06/00
✓ 106521B.1	HENKEL SURFACE TECHNOLOGIES	DISCARDED OBSOLETE VIRGIN LAB CHEMICAL		PAIL	4/06/00
✓ 106521B.13	HENKEL SURFACE TECHNOLOGIES	LAB PACK WATER REACTIVE SOLIDS		PAIL	4/08/00
✓ 106521B.15	HENKEL SURFACE TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY		PAIL	4/08/00
✓ 106521B.16	HENKEL SURFACE TECHNOLOGIES	LAB PACK CYANIDE SOLUTIONS		PAIL	4/08/00
✓ 106521B.6	HENKEL SURFACE TECHNOLOGIES	LAB PACKS - OXIDIZERS		PAIL	4/06/00
✓ 106521E.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK- RCRA TOXIC LIQUIDS/SOLIDS		DRUM	4/06/00
✓ 106521E.8	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE HIGH PH LIQUID		DRUM	4/06/00
✓ 521F.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK- HIGH PH CLEANERS		DRUM	4/06/00
✓ 521F.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS		DRUM	4/06/00
✓ 521F.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK- LOW PH LIQUIDS		DRUM	4/06/00
✓ 106523B.6	HENKEL SURFACE TECHNOLOGIES	EPOXY RESIN, SOLID		PAIL	4/30/00
✓ 106529.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS		DRUM	4/30/00
✓ 106529B.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS		PAIL	4/30/00
✓ 106529F.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS		CUBIC YARD	4/30/00
✓ 106769.6	HENKEL SURFACE TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)		DRUM	7/02/00
✓ 106769B.6	HENKEL SURFACE TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)		PAIL	7/02/00
✓ 106770.6	HENKEL SURFACE TECHNOLOGIES	CHROMIC ACID BASED CLEANER		DRUM	7/02/00
✓ 106770B.6	HENKEL SURFACE TECHNOLOGIES	CHROMIC ACID BASED CLEANER		PAIL	7/02/00
✓ 106771.6	HENKEL SURFACE TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORIDE)		DRUM	7/02/00
✓ 106771B.6	HENKEL SURFACE TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORIDE)		PAIL	7/02/00
✓ 106772.12	HENKEL SURFACE TECHNOLOGIES	LAB PACK-TOXIC ORGANIC LIQUIDS		DRUM	7/02/00
✓ 106772.13	HENKEL SURFACE TECHNOLOGIES	LAB PACK-4,4-DIPHENYLMETHANE DIISOCYANATE		DRUM	7/02/00
✓ 106772.14	HENKEL SURFACE TECHNOLOGIES	LAB PACK- TOXIC SOLIDS		DRUM	7/02/00
✓ 106772.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK-LEAN FUEL		DRUM	7/02/00
✓ 106772.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS		DRUM	7/02/00
✓ 106772B.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ORGANIC PEROXIDES		DRUM	7/02/00
✓ 106772B.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK-FLAMMABLE SOLID		DRUM	7/02/00
✓ 106772B.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK-SELF HEATING SOLIDS		DRUM	7/02/00
✓ 106772B.7	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ACIDIC LIQUIDS, FLAMMABLE		DRUM	7/02/00
✓ 106772B.8	HENKEL SURFACE TECHNOLOGIES	LAB PACK- MERCURY THERMOMETERS		DRUM	7/02/00
✓ 106772B.9	HENKEL SURFACE TECHNOLOGIES	LAB PACK-CAUSTIC LIQUID WITH LOW CONC. CYANIDE		DRUM	7/02/00
✓ 106772E.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK-OXIDIZING LIQUID		DRUM	7/02/00
✓ 106772F.10	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ORGANIC CAUSTICS		DRUM	7/02/00
✓ 72F.11	HENKEL SURFACE TECHNOLOGIES	LAB PACK, INORGANIC ACIDIC LIQUIDS WITH Hg		DRUM	7/02/00
✓ 72J.15	HENKEL SURFACE TECHNOLOGIES	LAB PACK-NON REGULATED LIQUIDS/SOLIDS		DRUM	7/02/00
✓ 106793.6	HENKEL SURFACE TECHNOLOGIES	ION EXCHANGE BEADS		DRUM	7/21/00
✓ 106828.6	HENKEL SURFACE TECHNOLOGIES	WASTE OIL EMULSIONS		DRUM	7/27/00

CONTAINER WASTE APPROVAL REPORT

REPORT DATE: 12/17/99

Page 2

REPORT TIME: 8:42 am

APPROVAL #	GENERATOR	WASTE COMMON NAME	UNIT PRICE	PER	EXP. DATE
✓ 107025.6	HENKEL SURFACE TECHNOLOGIES	TIN HYDRIDE	██████████	DRUM	10/07/00
✓ 107026.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ	██████████	DRUM	10/06/00
✓ 107026B.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ	██████████	PAIL	10/06/00
✓ 107027.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ	██████████	DRUM	10/06/00
✓ 107027B.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ	██████████	PAIL	10/06/00
✓ 107059.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS	██████████	DRUM	10/06/00
✓ 107059.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK, HIGH PH LIQUIDS	██████████	DRUM	10/06/00
✓ 107059B.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK, TOXIC LIQUIDS, ISOCYANATES AND PEST.	██████████	DRUM	10/06/00
✓ 107059B.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK, CHROMIC ACID SOLID	██████████	PAIL	10/06/00
✓ 107059F.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW FLASH LIQUIDS	██████████	DRUM	10/06/00
✓ 107059J.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK, NDN REGULATED LIQUID AND SOLIDS	██████████	ONE YARD BOXES	10/06/00
✓ 107060B.6	HENKEL SURFACE TECHNOLOGIES	DIETHYLENETRIAMINE	██████████	PAIL	10/06/00
✓ 107061B.6	HENKEL SURFACE TECHNOLOGIES	LIQUID EPOXY RESIN	██████████	PAIL	10/06/00
✓ 107062.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER	██████████	55 GALLON DRUM	10/06/00
✓ 107062B.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER	██████████	PAIL	10/06/00
✓ 107063B.6	HENKEL SURFACE TECHNOLOGIES	SURFACTANTS W/BARIUM	██████████	PAIL	10/06/00
✓ 107089.6	HENKEL SURFACE TECHNOLOGIES	EPOXY/ACRYLIC WASTE (BENZENE)	██████████	DRUM	10/18/00
✓ 107091.6	HENKEL SURFACE TECHNOLOGIES	WASTE PETROLEUM OILS (VINYL CHLORIDE)	██████████	DRUM	10/19/00
✓ 107237.2 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON CHLORINATED FLAMMABLE SOLVENTS	██████████	CUBIC YARD	11/22/00
✓ 107237B.10	HENKEL SURFACE TECHNOLOGIES	LAB PACK CYANIDE	██████████	PAIL	11/22/00
✓ 107237B.8	HENKEL SURFACE TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY	██████████	PAIL	11/22/00
✓ 107237B.9	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE SOLID	██████████	PAIL	11/22/00
✓ 107237E.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK OXIDIZING SOLIDS	██████████	DRUM	11/22/00
✓ 107237E.7	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS	██████████	CONTAINERS	11/22/00
✓ 107237F.3 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE LIQUIDS WITH AMINES, CHLORINATED	██████████	DRUM	11/22/00
✓ 107237F.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK TOXIC LIQUIDS/SOLIDS	██████████	30 GALLON DRUM	11/22/00
✓ 107237F.5 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK CAUSTIC LIQUID, FLAMMABLE	██████████	30 GALLON DRUM	11/22/00
✓ 107237J.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK-NDN REGULATED	██████████	CUBIC YARD	11/22/00
✓ 107274B.6	HENKEL SURFACE TECHNOLOGIES	NON-CHLOR FLAMM SOLV PROD MIX (BENZENE/PETROL NAP)	██████████	DRUM	11/22/00
✓ 107275.6	HENKEL SURFACE TECHNOLOGIES	BONDERLUBE 235, 235H (SODIUM NITRITE)	██████████		11/22/00
✓ 107276.6	HENKEL SURFACE TECHNOLOGIES	NITRATE SOLNS (CALCIUM NITRATE/AMMONIUM NITRATE)	██████████		11/22/00

COPY

DYNECOL, INC

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7144
FAX: (313) 571-7190

Recertification: (Y) N

WASTE APPROVAL FORM

Approval # 102327

Code 1390
I GENERAL INFORMATION

Customer: HENKEL SURFACE TECHNOLOGIES	Generator: SAME
Address: 32100 STEPHENSON HWY	Address: SAME
City: MADISON HTS	City: SAME
State: MI Zip Code: 48071	State: SAME Zip Code: SAME
Contact: D. LEMBKE	Contact: GEORGE BEYER (Jack Krueger)
Phone #: 2485339300 Fax: 589-4838	Phone #: SAME Fax: SAME
24 hour phone #:	EPA ID: MID057676124

II WASTE DESCRIPTION

Waste Common Name: Waste Paint Solvents
Specific Process Generating the Waste: ACCUMULATION OF PAINT + SPENT SOLVENTS USED FOR THEIR SOLVENT PROPERTIES

WASTE COMPOSITION must equal 100%:

	ACTUAL %	MIN	MAX
<u>PAINT</u>		<u>30</u>	<u>50</u>
<u>EX</u>		<u>10</u>	<u>30</u>
<u>TRICHLOROETHYLENE</u>	<u>21</u>		
<u>ACETONE</u>		<u>5</u>	<u>15</u>
<u>XYLENE</u>		<u>10</u>	<u>20</u>

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen Y ☒ N ☐ Oxidizer Y ☒ N ☐ Organics ☒ N ☐ Explosives Y ☒ N ☐ Phenols Y ☒ N ☐ Hexavalent Chromium Y ☒ N ☐
Radioactives Y ☒ N ☐ Poison Y ☒ N ☐ PCBs Y ☒ N ☐ Pesticides Y ☒ N ☐

As defined in 40 CFR 268: ☒ Non-wastewater ☐ Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y ☒ N ☐ Color: _____

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 451 or EPA 40 CFR 261: Yes ☒ No ☐

If yes, list all waste codes: F005, F003, F001, D001, D035, D040

This is a non-hazardous waste as defined by Michigan Act 451: Yes ☐ No ☒

If yes, list all waste codes: _____

This waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

Yes ☒ No ☐ * Unknown _____

If _____ list all waste codes: _____

* If based on generator knowledge, please read and understand certification in Section VI

CERTIFICATION FORM

(Submit with waste approval package)

UNDERLYING CONSTITUENTS/VOLATILE ORGANIC COMPOUNDS (VOC)

APPROVAL NUMBER: 102327.6 EPA ID NUMBER: MID057676124

GENERATOR NAME: HENKEL SURFACE TECHNOLOGIES

EPA HAZARDOUS WASTE NUMBERS: F001, F003, F001, D001, D035, D040

MANIFEST NUMBER (IF APPLICABLE): _____

PLEASE PLACE A CHECK MARK IN THE APPROPRIATE BOX:

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> | THIS WASTE IS NOT PROHIBITED FROM LAND DISPOSAL. (NOTE - ADDITIONAL CERTIFICATIONS MAY BE REQUIRED) |
| <input checked="" type="checkbox"/> | THIS WASTE IS PROHIBITED FROM LAND DISPOSAL. |
| <input checked="" type="checkbox"/> | THE WASTE DOES NOT CONTAIN UNDERLYING HAZARDOUS CONSTITUENTS LISTED IN 40 CFR 168.48 TABLE LTS-UNIVERSAL TREATMENT STANDARDS (EXCLUDING FLUORIDE, VANADIUM AND/OR ZINC). |
| <input type="checkbox"/> | THE WASTE DOES CONTAIN UNDERLYING HAZARDOUS CONSTITUENTS LISTED IN 40 CFR 168.48 TABLE LTS-UNIVERSAL TREATMENT STANDARDS (EXCLUDING FLUORIDE, VANADIUM AND/OR ZINC). |
| <input type="checkbox"/> | THE WASTE DOES NOT CONTAIN VOLATILE ORGANIC COMPOUNDS GREATER THAN 100 PPM. |
| <input checked="" type="checkbox"/> | THE WASTE DOES CONTAIN VOLATILE ORGANIC COMPOUNDS GREATER THAN 100 PPM. |

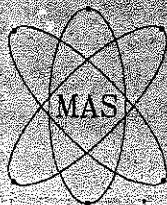
NOTE: ADDITIONAL INFORMATION AS REQUIRED PER 40 CFR 168.7 GENERAL PAPERWORK REQUIREMENTS TABLE CAN BE FOUND IN THE ATTACHED DYNECOL WASTE APPROVAL FORM.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE WASTE THROUGH ANALYSIS AND TESTING OR THROUGH KNOWLEDGE OF THE WASTE, AND BELIEVE THAT THE INFORMATION I SUBMITTED IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING A FALSE CERTIFICATION, INCLUDING A POSSIBILITY OF A FINE AND/OR IMPRISONMENT.

George Beyer
AUTHORIZED SIGNATURE

GEORGE BEYER
PRINTED NAME

3/25/99
DATE



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2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

:(313) 964-3680

Fax No: (313) 964-2339

Date : 23-Mar-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 90311037
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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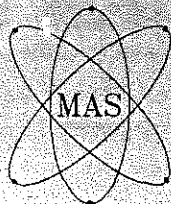
- 1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.*
- 2. N/D=Not detected.*
- 3. Results relate only to the items tested.*
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)*
ppb=parts per billion, μ g/l, μ g/kg or μ g/kg(dry weight)
- 5. QC information on file.*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Ed Harrison
Quality Manager ext. 111



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Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 90311037

MOLLY DWINNELLS

DYNECOL, INC.

6520 GEORGIA

DETROIT, MI 48211

DATE COMPLETED: 23-Mar-99

P.O. #: 115-4349

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

PHYSICAL DESCRIPTION: LIQUID

Sample Date: 11-Mar-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	98	°F	---	< 140 D001	FH	03/16/99	
SW-846 9040B	*pH / CORROSIVITY	6.55	UNITS	---	<2 : >12.5 D002	FH	03/12/99	
	REACTIVITY:							
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	HL	03/15/99	
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003	FH	03/15/99	
SW-846 9020BM	TOTAL ORGANIC HALOGENS	270	mg/kg	100	---	BA	03/12/99	
SW-846 8082	PCB:		mg/kg		---	GM	03/18/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV		
6010A	ARSENIC	N/D		1.0	5.0 D004		03/18/99	
6010A	BARIUM	N/D		10	100 D005		03/18/99	
6010A	CADMIUM	N/D		0.50	1.0 D006		03/18/99	
6010A	CHROMIUM	N/D		1.0	5.0 D007		03/18/99	
6010A	LEAD	N/D		5.0	5.0 D008		03/18/99	
7470A	MERCURY	N/D		0.10	0.2 D009		03/17/99	
6010A	SELENIUM	N/D		0.50	1.0 D010		03/18/99	
6010A	SILVER	N/D		1.0	5.0 D011		03/18/99	

* SAMPLE pH MEASURED AT 25°C.

J. Harrison
Quality Manager ext. 111

Recertification: ☒ Y ☐ N

WASTE APPROVAL FORM

 Approval # 102324.6

 Code 1390

I GENERAL INFORMATION

Customer: <u>PARKER ARKHEM</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(510) 553-9300</u> Fax: <u>(510) 559-4534</u>	Phone #: <u>(510) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 124</u>

II WASTE DESCRIPTION

 Waste Common Name: Waste Solid Soaps
 Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

WASTE COMPOSITION (must equal 100%):

	ACTUAL %	MIN.	MAX.
<u>Sodium Stearate</u>		<u>5</u>	<u>10</u>
<u>Water</u>		<u>90</u>	<u>95</u>
<u>Metals (Fe, Zn, Cu, Mg, Li)</u>			<u>0.2</u>

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y <input checked="" type="radio"/> N	Oxidizer	Y <input checked="" type="radio"/> N	Organics	Y <input checked="" type="radio"/> N	Explosives	Y <input checked="" type="radio"/> N	Phenols	Y <input checked="" type="radio"/> N	Hexavalent Chromium	Y <input checked="" type="radio"/> N
Radioactives	Y <input checked="" type="radio"/> N	Poison	Y <input checked="" type="radio"/> N	PCBs	Y <input checked="" type="radio"/> N	Pesticides	Y <input checked="" type="radio"/> N				

 As defined in 40 CFR 268: ☒ Non-wastewater () Wastewater

LIQUID

SOLID

☒ SLURRY

 Sample submitted to Dynecol: Y ☒ N Color:

III RCRA/ACT 64 WASTE CHARACTERIZATION

 This is a hazardous waste as defined by either Michigan Act 54 or EPA 40 CFR 261: Yes No ☒

 If yes, list all waste codes:

 This is a non-hazardous waste as defined by Michigan Act 136: Yes ☒ No

 If 029L list all waste codes:

This waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

 Yes No ☒ * Unknown

 If yes, list all waste codes:

IV SHIPPING INFORMATION

Waste Volume: 5-10 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

OT Proper Shipping Name per 49 CFR 172.101:

non-haz waste liquid

DOT Hazard Class: UNNA Number: Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

7/10/95

Date

George J. Beyer

Generator Signature

Technical Manager

Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 10ppm for Cyanide and Sulfide)
- PCBs, 3HOCs (Method 8020), Nickel and Thallium
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

* _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

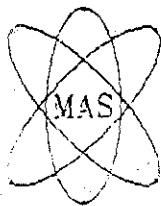
Approval #: 102324.6

Treatment Facility: _____ CMF: ✓

Approved by: (3)

Date: _____

Expiration date: 7/6/00

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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date : 19-Jul-99

Client : MOLLY DWINNELLS
: DYNECOL, INC.

Mas# : 90712002

PROJECT: : MENKEL SURFACE TECHNOLOGIES

Sample ID. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

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2. N/D=Not detected.

results relate only to the items tested.

pm=parts per million, mg/l, mg/kg or mg/kg(dry weight)

ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)

5. QC information on file.

6. EQL=Estimated Quantitation Limit.

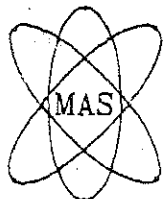
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh

Cha Hindbaugh
Lab. Quality Manager ext. 115



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: (313) 964-3680

Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 90712002

MOLLY DWINNELLS

DYNECOL, INC.

6520 GEORGIA

DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

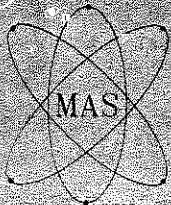
METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*PH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:							
SW-846 7.3.1.1	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	NW	07/13/99	
40 CFR 261.22.5	REACTIVE SULFIDE	NEGATIVE	---	---	D003			
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 8082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1330	N/D		1.0				
SW-846	ICLP METALS (1311):		mg/l			NW	07/15/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE PH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh

Quality Manager ext. 115



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No: (313) 964-2339

Date : 19-Jul-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 90712002
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.

2. N/D=Not detected.

Results relate only to the items tested.

ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)

ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)

5. QC information on file.

6. EQL=Estimated Quantitation Limit.

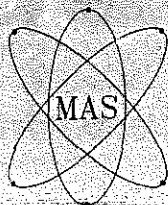
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext. 115



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: (313) 964-3680
Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 90712002

MOLLY DWINNELS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99
P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES
SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS
PHYSICAL DESCRIPTION: SOLID
Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:					NW	07/13/99	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003			
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 8082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV	07/15/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE pH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext. 115

Send

HENKEL CORPORATION

HMH-10

CHEMICALS GROUP

Material Safety Data Sheet

pH=7

EMERGENCY PHONE: (513) 482-2297

CHEMTREC 800-424-9300

MSDS REFERENCE: EMERY 5451 (1/15/97)

SECTION I - IDENTIFICATION

WARNING! CAUSES EYE IRRITATION!
AVOID CONTACT WITH EYES. WASH THOROUGHLY AFTER HANDLING.

PRODUCT: **APG* 325 N**
* APG IS A REGISTERED TRADEMARK OF HENKEL CORPORATION

SYNONYMS: **ALKYL POLYGLYCOSIDE SURFACTANT**

CHEMICAL: **D-GLUCOPYRANOSIDE, C9-11 ALKYL, OLIGOMERIC**

CAS NO: 132778-08-6

SARA HAZARD: ACUTE (SECTION 311/312)
TITLE III SECTION 313- NOT LISTED

SECTION II - INGREDIENTS AND HAZARD CLASSIFICATION

COMPOSITION	%	PEL/TLV	HAZARD
ALKYL POLYGLYCOSIDE (132778-08-6)	50	NONE/NONE	EYE IRRITANT
WATER (7732-18-5)	AP. 50	NONE/NONE	NONE

SECTION III - HEALTH INFORMATION

INHALATION: NO DATA AVAILABLE

INGESTION: ACUTE ORAL LD50: > 5.0 G/KG IN MALE AND FEMALE SPRAGUE-DAWLEY RATS.

EYE CONTACT: 0.1 ML OF PRODUCT WAS INSTILLED INTO THE EYES OF SIX RABBITS. AFTER A 21-DAY OBSERVATION PERIOD THE MAXIMUM TOTAL EYE IRRITATION SCORES RANGED FROM 59-78 (SCALE 0-110). THE MATERIAL PRODUCED SEVERE IRRITATION AND CORNEAL OPACITY WHICH PERSISTED THROUGH DAY 21. NO EVIDENCE OF CORROSION WAS NOTED.

SKIN CONTACT: THE PRIMARY SKIN IRRITATION SCORE WAS 1.2 (RABBIT) (SCALE 0-8). THE MATERIAL WAS CLASSIFIED AS A MILD SKIN IRRITANT.

THE ACUTE DERMAL LD50 VALUE WAS GREATER THAN 2.0 G/KG IN MALE AND FEMALE NEW ZEALAND WHITE RABBITS.

RECEIVED

MAY 04 1998

SECTION IV - OCCUPATIONAL EXPOSURE LIMITS

PEL: NO OSHA PEL

TLV: NO ACGIH TLV

SECTION V - EMERGENCY FIRST AID PROCEDURE

FOR OVEREXPOSURE BY SWALLOWING: CALL A PHYSICIAN OR POISON CONTROL CENTER PROMPTLY.

FOR OVEREXPOSURE BY SKIN CONTACT: IMMEDIATELY FLUSH SKIN WITH PLENTY OF WATER WHILE REMOVING CONTAMINATED CLOTHING.

FOR OVEREXPOSURE BY EYE CONTACT: IMMEDIATELY FLUSH EYES WITH PLENTY OF COOL WATER FOR AT LEAST 15 MINUTES. DO NOT LET VICTIM RUB EYES. GET MEDICAL ATTENTION IMMEDIATELY.

FOR OVEREXPOSURE BY INHALATION: IMMEDIATELY REMOVE VICTIM TO FRESH AIR. IF VICTIM HAS STOPPED BREATHING GIVE ARTIFICIAL RESPIRATION, PREFERABLY BY MOUTH-TO-MOUTH. GET MEDICAL ATTENTION IMMEDIATELY.

SECTION VI - PHYSICAL DATA

BOILING POINT: >212 DEG F

MELTING POINT: NOT DETERMINED

VAPOR PRESSURE: NOT DETERMINED

SPECIFIC GRAVITY: 1.1

VAPOR DENSITY (AIR=1): NOT DETERMINED

SOLUBILITY IN WATER: MISCIBLE

APPEARANCE AND COLOR:

CLEAR, VISCOUS, LIGHT-YELLOW LIQUID; MILD CHARACTERISTIC ODOR

SECTION VII - FIRE AND EXPLOSION HAZARDS

FLASH POINT & METHOD USED: >200 DEG F (>93 DEG C) (CLOSED CUP)

AUTO-IGNITION TEMPERATURE: NOT DETERMINED

FLAMMABLE LIMITS IN AIR, % BY VOL. LOWER: NOT DETERMINED

FLAMMABLE LIMITS IN AIR, % BY VOL. UPPER: NOT DETERMINED

NFPA RATING: NO NFPA RATING

HMIS RATING: HEALTH (2) FIRE (1) REACTIVITY (0)

SPECIAL FIRE FIGHTING PROCEDURES & PRECAUTIONS

THIS PRODUCT WILL PRODUCE FOAM WHEN MIXED WITH WATER. (INDIVIDUALS SHOULD PERFORM ONLY THOSE FIRE FIGHTING PROCEDURES FOR WHICH THEY HAVE BEEN TRAINED). USE WATER SPRAY, DRY CHEMICAL, FOAM OR CARBON DIOXIDE. USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. IF A SPILL OR LEAK HAS NOT IGNITED, USE WATER SPRAY TO DISPERSE THE VAPORS. WATER SPRAY MAY BE USED TO FLUSH SPILLS AWAY FROM FIRE AND TO DILUTE SPILLS TO NONFLAMMABLE MIXTURES.

UNUSUAL FIRE & EXPLOSION HAZARDS

FIREFIGHTERS SHOULD WEAR SELF-CONTAINED BREATHING APPARATUS IN THE POSITIVE-PRESSURE MODE WITH A FULL FACEPIECE WHEN THERE IS A POSSIBILITY OF EXPOSURE TO SMOKE, FUMES OR HAZARDOUS DECOMPOSITION PRODUCTS.

SECTION VIII - REACTIVITY

STABILITY:

GENERALLY STABLE

HAZARDOUS POLYMERIZATION:

NONE LIKELY

CONDITIONS & MATERIALS TO AVOID:

AVOID CONTACT WITH STRONG ACIDS AND OXIDIZING AGENTS.

HAZARDOUS DECOMPOSITION PRODUCTS:

DECOMPOSITION MAY PRODUCE CARBON MONOXIDE AND CARBON DIOXIDE.

SECTION IX - EMPLOYEE PROTECTION

CONTROL MEASURES:

HANDLE IN THE PRESENCE OF ADEQUATE VENTILATION.

RESPIRATORY PROTECTION:

RECOMMENDED EXPOSURE LIMITS (i.e., OSHA-PEL AND ACGIH-TLV) HAVE NOT BEEN ESTABLISHED FOR THIS MATERIAL. WHETHER THERE IS A NEED FOR RESPIRATORY PROTECTION UNDER YOUR CONDITIONS OF HANDLING OF THIS MATERIAL SHOULD BE EVALUATED BY A QUALIFIED HEALTH SPECIALIST.

PROTECTIVE CLOTHING:

WEAR GLOVES AND PROTECTIVE CLOTHING WHICH ARE IMPERVIOUS TO THE PRODUCT FOR THE DURATION OF ANTICIPATED EXPOSURE IF THERE IS POTENTIAL FOR PROLONGED OR REPEATED SKIN CONTACT.

EYE PROTECTION:

WEAR SAFETY GLASSES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 WHERE NO CONTACT WITH THE EYE IS ANTICIPATED. CHEMICAL SAFETY GOGGLES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 SHOULD BE WORN WHENEVER THERE IS THE POSSIBILITY OF SPLASHING OR OTHER CONTACT WITH THE EYES.

SECTION X - ENVIRONMENTAL PROTECTION

ENVIRONMENTAL PRECAUTIONS:

AVOID UNCONTROLLED RELEASES OF THIS MATERIAL. WHERE SPILLS ARE POSSIBLE, A COMPREHENSIVE SPILL RESPONSE PLAN SHOULD BE DEVELOPED AND IMPLEMENTED.

SPILL OR LEAK PRECAUTIONS:

WEAR APPROPRIATE RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING AS DESCRIBED IN SECTION IX. CONTAIN SPILLED MATERIAL. TRANSFER TO SECURE CONTAINERS. WHERE NECESSARY, COLLECT USING ABSORBENT MEDIA. IN THE EVENT OF AN UNCONTROLLED RELEASE OF THIS MATERIAL, THE USER SHOULD DETERMINE IF THE RELEASE IS REPORTABLE UNDER APPLICABLE LAWS AND REGULATIONS.

WASTE DISPOSAL:

ALL RECOVERED MATERIAL SHOULD BE PACKAGED, LABELED, TRANSPORTED, AND DISPOSED OR RECLAIMED IN CONFORMANCE WITH APPLICABLE LAWS AND REGULATIONS AND IN CONFORMANCE WITH GOOD ENGINEERING PRACTICES. AVOID LANDFILLING OF LIQUIDS. RECLAIM WHERE POSSIBLE.

SECTION XI - REGULATORY CONTROLS

DEPARTMENT OF TRANSPORTATION:

DOT CLASSIFICATION: NOT REGULATED

DOT PROPER SHIPPING NAME:

OTHER DOT INFORMATION:

OTHER REGULATORY REQUIREMENTS:

LISTED IN TSCA INVENTORY

CERCLA HAZARDOUS MATERIALS:

NONE NOTED

SECTION XII - PRECAUTIONS: HANDLING, STORAGE AND USAGE

SPILLED MATERIAL MAY BE SLIPPERY. CLEAN UP SPILLS IMMEDIATELY BEFORE WALKING IN SPILL AREA.

The information presented herein is believed to be factual as it has been derived from the works and opinions of persons believed to be qualified experts; however, nothing contained in this information is to be taken as a warranty or representation for which Henkel Corporation bears legal responsibility. The user should review any recommendations in the specific context of the intended use to determine whether they are appropriate.

PREPARED BY: ROBERT E. BORGERDING

DATE: 1/15/97

SUPERSEDES:

Henkel Corporation, Chemicals Group
4900 Este Avenue
Cincinnati, Ohio 45232

WHITE TO YELLOW CRYSTALLINE POWDER AND CHUNKS

PHYSICAL PROPERTIES

MELTING POINT: 54 C TO 56 C
FLASHPOINT 177 F
80C

SECTION 10. - - - - - STABILITY AND REACTIVITY - - - - -

INCOMPATIBILITIES

STRONG OXIDIZING AGENTS

HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS

TOXIC FUMES OF:

CARBON MONOXIDE, CARBON DIOXIDE

NITROGEN OXIDES

SECTION 11. - - - - - TOXICOLOGICAL INFORMATION - - - - -

ACUTE EFFECTS

MAY BE HARMFUL BY INHALATION, INGESTION, OR SKIN ABSORPTION.

MAY CAUSE EYE IRRITATION.

MAY CAUSE SKIN IRRITATION.

TO THE BEST OF OUR KNOWLEDGE, THE CHEMICAL, PHYSICAL, AND
TOXICOLOGICAL PROPERTIES HAVE NOT BEEN THOROUGHLY INVESTIGATED.

SECTION 12. - - - - - ECOLOGICAL INFORMATION - - - - -

DATA NOT YET AVAILABLE.

SECTION 13. - - - - - DISPOSAL CONSIDERATIONS - - - - -

THIS COMBUSTIBLE MATERIAL MAY BE BURNED IN A CHEMICAL INCINERATOR
EQUIPPED WITH AN AFTERBURNER AND SCRUBBER.

OBSERVE ALL FEDERAL, STATE AND LOCAL ENVIRONMENTAL REGULATIONS.

SECTION 14. - - - - - TRANSPORT INFORMATION - - - - -

CONTACT ALDRICH CHEMICAL COMPANY FOR TRANSPORTATION INFORMATION.

SECTION 15. - - - - - REGULATORY INFORMATION - - - - -

DATA NOT AVAILABLE

SECTION 16. - - - - - OTHER INFORMATION - - - - -

THE ABOVE INFORMATION IS BELIEVED TO BE CORRECT BUT DOES NOT PURPORT TO
BE ALL INCLUSIVE AND SHALL BE USED ONLY AS A GUIDE. SIGMA, ALDRICH,
FLUKA SHALL NOT BE HELD LIABLE FOR ANY DAMAGE RESULTING FROM HANDLING
OR FROM CONTACT WITH THE ABOVE PRODUCT. SEE REVERSE SIDE OF INVOICE OR
PACKING SLIP FOR ADDITIONAL TERMS AND CONDITIONS OF SALE.

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HMH - 21
5-08

PH = 5-7

241992

M A T E R I A L S A F E T Y D A T A S H E E T

CIBA-GEIGY CORPORATION

PIGMENTS DIVISION

315 WATER STREET

NEWPORT, DE 19804

(800) 355-CIBA, OR -2422 OR

DIRECT: (302) 633-2060, OR -2061

EMERGENCY PHONE NUMBER:

(800) 888-8372

SECTION I-IDENTITY INFORMATION

IDENTITY (TRADE NAME): UNISPERSE GREEN G-EN

FAMILY/CHEMICAL NAME:

COPPER PHTHALOCYANINE

C.I. PIGMENT GREEN 7

C.I. NO. 74260

PRODUCT TYPE:

AQUEOUS PIGMENT DISPERSION.

HAZARD STATEMENT :

* THIS MATERIAL SAFETY DATA SHEET (MSDS) HAS BEEN *
* PREPARED IN COMPLIANCE WITH THE FEDERAL OSHA HAZARD *
* COMMUNICATION STANDARD 29 CFR 1910.1200. *
* THIS PRODUCT IS CONSIDERED TO BE A HAZARDOUS *
* CHEMICAL UNDER THAT STANDARD. *

SECTION II-HAZARDOUS INGREDIENTS

SPECIFIC CHEMICAL NAME:

PROPRIETARY EYE IRRITANT

CAS #: PROPRIETARY

COMMON NAME: PROPRIETARY

EXPOSURE LIMITS:

OSHA PEL: NOT ESTABLISHED

ACGIH TLV: NOT ESTABLISHED

CARCINOGENICITY:

THIS CHEMICAL HAS NOT BEEN REVIEWED FOR CARCINOGEN-
ICITY BY NTP, IARC, OR OSHA.

UNISPERSE GREEN G-EN

SECTION III-PHYSICAL DATA

APPEARANCE AND ODOR:
GREEN LIQUID, ODORLESS
BOILING POINT:
100C
FREEZING POINT:
< 0C
DECOMPOSITION TEMPERATURE:
>200C.
SOLUBILITY IN WATER:
MISCIBLE
SPECIFIC GRAVITY:
1.3 G/CM3

SECTION IV-FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:
NOT APPLICABLE.
FLAMMABLE LIMITS IN AIR-LOWER:
NOT APPLICABLE.
FLAMMABLE LIMITS IN AIR-UPPER:
NOT APPLICABLE.
EXTINGUISHING MEDIA:
CARBON DIOXIDE, DRY CHEMICAL, FOAM, WATER.
FIRE FIGHTING PROCEDURES-SPECIAL:
USE SELF-CONTAINED BREATHING APPARATUS.
UNUSUAL FIRE AND EXPLOSION HAZARDS:
DECOMPOSITION AND COMBUSTION PRODUCTS MAY BE TOXIC.

SECTION V-REACTIVITY DATA

STABILITY:
STABLE.
CONDITIONS TO AVOID:
SENSITIVE TO TEMPERATURES BELOW -10C (+14F). AVOID TEMPERATURES ABOVE 60C (140F).
HAZARDOUS POLYMERIZATION:
WILL NOT OCCUR.

SECTION VI-HEALTH HAZARD DATA

PRIMARY ROUTES OF EXPOSURE:
DERMAL, INHALATION.
OVEREXPOSURE EFFECTS:
PRODUCT CONTAINS GREATER THAN 1% OF AN INGREDIENT FOUND TO BE AN EYE IRRITANT.
THE PRESERVATIVE IN THIS PRODUCT IS A SKIN SENSITIZER. THOUGH IT IS PRESENT AT A CONCENTRATION LESS THAN 1%, INDIVIDUALS ALREADY SENSITIZED TO THIS BENZISOTHIAZOLINONE - CONTAINING PRESERVATIVE SHOULD EXERCISE CARE IN HANDLING.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:

UNISPERSE GREEN G-EN

SEE OVEREXPOSURE EFFECTS.

EMERGENCY AND FIRST AID PROCEDURES-EYES:

FOR EYE CONTACT, FLUSH EYES WITH PLENTY OF WATER FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-SKIN:

FOR SKIN CONTACT, WASH AFFECTED AREAS WITH PLENTY OF WATER, AND SOAP, IF AVAILABLE, FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-INGESTION:

IF SWALLOWED, GIVE AT LEAST 3-4 GLASSES OF WATER BUT DO NOT INDUCE VOMITING. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSING PERSON.

EMERGENCY AND FIRST AID PROCEDURES-INHALATION:

IF INHALED, REMOVE FROM AREA TO FRESH AIR. GET MEDICAL ATTENTION IF RESPIRATORY IRRITATION DEVELOPS OR IF BREATHING BECOMES DIFFICULT.

SECTION VII-SPILL OR LEAK PROCEDURES

SPILL PROCEDURES:

WEAR PROTECTIVE CLOTHING SPECIFIED BELOW. ISOLATE SPILL AREA. ABSORB ONTO SAND OR OTHER ABSORBENT MATERIAL. SHOVEL INTO CLOSABLE CONTAINER FOR DISPOSAL.

WASTE DISPOSAL METHODS:

DISPOSE IN ACCORDANCE WITH FEDERAL, STATE AND LOCAL REGULATIONS.

SECTION VIII-SPECIAL PROTECTION INFORMATION

VENTILATION:

WORK IN WELL VENTILATED AREAS. DO NOT BREATHE MISTS OR VAPORS.

PROTECTIVE GLOVES:

AS WITH ANY INDUSTRIAL CHEMICAL, UNNECESSARY SKIN CONTACT SHOULD BE AVOIDED. IMPERVIOUS GLOVES RECOMMENDED.

EYE PROTECTION:

WEAR SAFETY GLASSES OR GOGGLES.

RESPIRATORY PROTECTION:

USE NIOSH RESPIRATORS AS NEEDED TO MITIGATE EXPOSURE.

SECTION IX-SPECIAL PRECAUTIONS

HANDLING, SHIPPING AND STORING PRECAUTIONS:

WARNING! EYE IRRITANT.

AVOID CONTACT WITH EYES, SKIN AND CLOTHING. AVOID BREATHING DUST, MIST OR VAPORS. USE ONLY WITH ADEQUATE VENTILATION. WASH HANDS AND FACE THOROUGHLY BEFORE EATING, DRINKING, OR USING TOBACCO PRODUCTS.

KEEP ABOVE 32F. KEEP CONTAINER CLOSED WHEN NOT IN USE. FOR INDUSTRIAL USE ONLY.

SECTION X- REGULATORY INFORMATION

UNISPERSE GREEN G-EN

TRANSPORTATION:

NOT REGULATED.

SARA/TITLE III - TOXIC CHEMICALS LIST:

THIS PRODUCT DOES NOT CONTAIN A TOXIC CHEMICAL FOR ROUTINE
ANNUAL 'TOXIC CHEMICAL RELEASE REPORTING' UNDER SEC. 313
(40 CFR 372).

TSCA INVENTORY STATUS:

ALL CHEMICAL COMPONENTS ARE LISTED ON THE TSCA INVENTORY.

PENNSYLVANIA RIGHT-TO-KNOW ACT:

THE FOLLOWING IS REQUIRED COMPOSITION INFORMATION.

CHEMICAL NAME : C.I. PIGMENT GREEN 7

CAS NUMBER : 1328-53-6

COMMENTS : ENVIRONMENTAL HAZARD.
* * *

CHEMICAL NAME : SPECIFIC CHEMICAL IDENTITY OF THIS COMPONENT
IS BEING WITHHELD AS TRADE SECRET.

GENERIC NAME : SURFACTANT

COMMENTS : NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.
* * *

CHEMICAL NAME : 1,2-PROPANEDIOL

CAS NUMBER : 57-55-6

COMMON NAME : 1,2-PROPYLENE GLYCOL

COMMENTS : HAZARDOUS SUBSTANCE.
* * *

CHEMICAL NAME : WATER

CAS NUMBER : 7732-18-5

COMMON NAME : WATER

COMMENTS : NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.
* * *

PLEASE NOTE:

-
- OUR PRODUCTS ARE INTENDED FOR INDUSTRIAL USE ONLY ! THIS -
 - MATERIAL IS NOT INTENDED FOR USE IN PRODUCTS FOR WHICH -
 - PROLONGED CONTACT WITH MUCOUS MEMBRANES OR ABRADED SKIN -
 - OR IMPLANTATION WITHIN THE HUMAN BODY IS SPECIFICALLY -
 - INTENDED. CIBA-GEIGY CORPORATION IS NOT ABLE TO RECOM- -
 - MEND THIS MATERIAL AS SAFE AND EFFECTIVE FOR SUCH USES -
 - AND ASSUMES NO LIABILITY FOR SUCH USE. -
-

ISSUE DATE: [REDACTED] REVISION: 05C

FOR FURTHER INFORMATION, PLEASE CONTACT: DR. EVA M. VARY

THE INFORMATION AND RECOMMENDATIONS CONTAINED HEREIN ARE
BASED UPON DATA BELIEVED TO BE CORRECT. HOWEVER, NO GUARANTEE
OR WARRANTY OF ANY KIND EXPRESSED OR IMPLIED IS MADE WITH
RESPECT TO THE INFORMATION CONTAINED HEREIN.

UNISPERSE GREEN G-EN

Recertification: ☒ Y ☐ N

WASTE APPROVAL FORM

Approval # 102324.6

Code 1390

I GENERAL INFORMATION

Customer: <u>PARKER ARKHEM</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(313) 553-7300</u> Fax: <u>(313) 553-4534</u>	Phone #: <u>(313) 553-7300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 122</u>

II WASTE DESCRIPTION

Waste Common Name: Waste Solid Soaps
Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

STE COMPOSITION (must equal 100 %):	ACTUAL %	MIN.	MAX.
<u>Sodium Stearate</u>		<u>5</u>	<u>10</u>
<u>Water</u>		<u>90</u>	<u>95</u>
<u>Metals (Fe, Zn, Cu, Mg, Li)</u>			<u>0.2</u>

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y <input checked="" type="radio"/> N <input type="radio"/>	Oxidizer	Y <input checked="" type="radio"/> N <input type="radio"/>	Organics	Y <input checked="" type="radio"/> N <input type="radio"/>	Explosives	Y <input checked="" type="radio"/> N <input type="radio"/>	Phenols	Y <input checked="" type="radio"/> N <input type="radio"/>	Hexavalent Chromium	Y <input checked="" type="radio"/> N <input type="radio"/>
Radioactives	Y <input checked="" type="radio"/> N <input type="radio"/>	Poison	Y <input checked="" type="radio"/> N <input type="radio"/>	PCBs	Y <input checked="" type="radio"/> N <input type="radio"/>	Pesticides	Y <input checked="" type="radio"/> N <input type="radio"/>				

As defined in 40 CFR 268: ☒ Non-wastewater ☐ Wastewater **LIQUID** **SOLID** **SLURRY**

Sample submitted to Dynecol: Y ☐ N ☐ Color:

II RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes ☐ No ☒

If yes, list all waste codes:

This is a non-hazardous waste as defined by Michigan Act 136: Yes ☒ No ☐

If yes, list all waste codes: 029L

Waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

No ☒ Unknown ☐

If yes, list all waste codes:

If based on generator knowledge, please read and understand certification in Section VI

IV SHIPPING INFORMATION

Waste Volume: 5-10 UNITS (circle one) GALLONS POUNDS DRUMS OTHER

Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 171.101:

non-haz waste liquid

DOT Hazard Class:

UNNA Number:

Packing Group: I II III

None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

7.6.99

Date

George J. Beyer

Generator Signature

Technical Manager

Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW-846):

- Flash, pH, and Reactivity (Detection limit of 10ppm for Cyanide and Sulfide)
- PICs: SECs Method 9020: Nickel and Thallium
- ICP analysis: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

* _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

Approval #: 102324.6

Treatment Facility: _____ CMF: ✓

Approved by: (B)

Date: _____

Expiration date: 7/6/00



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No: (313) 964-2339

Date : 19-Jul-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 90712002
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

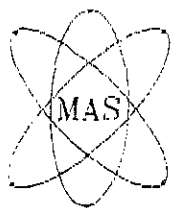
For your convenience the following legend applies to all the following data sheets.

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2. N/D=Not detected.
3. Results relate only to the items tested.
4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
5. QC information on file.
6. EQL=Estimated Quantitation Limit.
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh
Lab. Quality Manager ext. 115



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: (313) 964-3680

Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 90712002

MOLLY DWINNELLS

DYNECOL, INC.

6520 GEORGIA

DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:					NW	07/13/99	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003			
SW-846 9020HM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 8082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV	07/15/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE pH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh

Lab. Quality Manager ext. 115

Recertification: (Y) N

WASTE APPROVAL FORM

Approval # 102324-6

Code 1390

I GENERAL INFORMATION	
Customer: PARKER ARKHEM	Generator: SAME
Address: 32100 STEPHENSON HWY	Address: 32100 STEPHENSON HWY
City: MADISON HEIGHTS	City: MADISON HEIGHTS
State: MI Zip Code: 48071	State: MI Zip Code: 48071
Contact: DELUDES LEMBEKE	Contact: GEORGE BEYER
Phone #: (810) 583-9300 Fax: (810) 583-4834	Phone #: (810) 583-9300 Fax:
24 hour phone #:	EPA ID#: MID 057 676 124

II WASTE DESCRIPTION
Waste Common Name: Waste Solid Soaps
Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

STE COMPOSITION (must equal 100%)	ACTUAL %	MIN.	MAX.
Sodium Stearate		5	10
Water		90	95
Metals (Fe, Zn, Cu, Mg, Li)			0.2

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y (N)	Oxidizer	Y (N)	Organics	Y (N)	Explosives	Y (N)	Phenols	Y (N)	Hexavalent Chromium	Y (N)
Radioactives	Y (N)	Poison	Y (N)	PCBs	Y (N)	Pesticides	Y (N)				

As defined in 40 CFR 268: ☒ Non-wastewater () Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y N Color: _____

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes _____ No X

If yes, list all waste codes: _____

This is a non-hazardous waste as defined by Michigan Act 136: Yes X No _____

If yes, list all waste codes: 029L

Waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043: Yes _____ No X Unknown _____

If yes, list all waste codes: _____

IV SHIPPING INFORMATION

Waste Volume: 26 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous

DOT Hazard Class: None UN/NA Number: None Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

7 18 97

Date

George J. Beyer

Generator Signature

Technical Manager

Title

WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, SHOCs (Method 9020), Nickel and Thallium
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

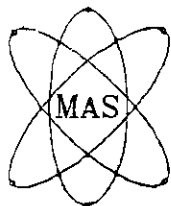
Approval #: 102324.6

Treatment Facility: (2) CMF: ✓

Approved by: _____

Date: _____

Expiration date: 6/30/97



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Detroit, Michigan 48201

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Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No: (313) 964-2339

Date : 26-Jun-97
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 70618051
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample ID. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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- 2. N/D=Not detected.*
- 3. Results relate only to the items tested.*
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, μ g/l, μ g/kg or μ g/kg(dry weight)*
- 5. QC information on file.*

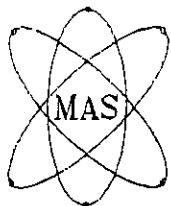
If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager



Midwest Analytical Services, Inc.

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2727 Second Avenue
Detroit, Michigan 48201

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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

IN: KC

TEST REPORT

MAS #: 70618051

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 26-Jun-97
P.O. #: 115-3084

PROJECT: HENKEL SURFACE TECHNOLOGIES
SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS
PHYSICAL DESCRIPTION: SOLID
Sample Date: 13-Jun-97

FILE: WASTE \ DYNECOL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IGNITIBILITY	> 200	°F	---	< 140 D001	CS	06/23/97
SW-846 9045C	*pH / CORROSIVITY	8.37	UNITS	---	<2 : >12.5 D002	CS	06/20/97
	REACTIVITY:					CS	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003		06/23/97
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	20	500 D003		06/20/97
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	GEM	06/24/97
SW-846 B080A	PCB:		mg/kg		---	DGE	06/20/97
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
	AROCLOR 1246	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
SW-846	TCLP METALS (1311):		mg/l			KRW	06/25/97
6010A	ARSENIC	N/D		1.0	5.0 D004		
6010A	BARIUM	N/D		10	100.0 D005		
6010A	CADMIUM	N/D		0.50	1.0 D006		
6010A	CHROMIUM	N/D		1.0	5.0 D007		
6010A	COPPER	N/D		1.0	100.0 001D (MDNR)		
6010A	LEAD	N/D		1.0	5.0 D008		
7470A	MERCURY	N/D		0.10	0.2 D009		
6010A	NICKEL	N/D		1.0	---		
6010A	SELENIUM	N/D		0.50	1.0 D010		
6010A	SILVER	N/D		1.0	5.0 D011		
6010A	THALLIUM	N/D		5.0	---		
6010A	ZINC	N/D		5.0	500.0 003D (MDNR)		

* SAMPLE pH MEASURED IN WATER AT 24.1°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager

IV SHIPPING INFORMATION

Waste Volume: 50-75 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous Waste Liquid

DOT Hazard Class:

UNNA Number:

Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

6, 12, 96
Date

George J. Beyer
Generator Signature

Technical Manager
Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactivity (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, SHOCs (Method 9020), Nickel and Thallium
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

is _____ No _____ Complete _____ Partial _____ * MSDS _____

Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

II DYNECOL USE ONLY

Proval #: 102412.6

Shipment Facility: _____ CMF: 1

Approved by: J. O'Mara

Date: _____

Expiration date: 7/31/97

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

WASTE APPROVAL FORM

Certification: Y ☒ N

Approval # 102417.6

Code 1390

I GENERAL INFORMATION

Customer: <u>PARKER ARKHEM</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(810) 553-9300</u> Fax: <u>(810) 559-4834</u>	Phone #: <u>(810) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 124</u>

II WASTE DESCRIPTION

Waste Common Name: Waste Thermal 55

Specific Process Generating the Waste: best for for skin from paint exchanges

WASTE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAX.
<u>Thermal</u>	<u>> 95</u>		
<u>Water</u>	<u>< 5</u>		

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS.

Ammonia Y ☒ N Oxidizer Y ☐ N Organics Y ☒ N Explosives Y ☒ N Phenols Y ☒ N Hexavalent Chromium Y ☒ N
Radioactives Y ☒ N Poison Y ☐ N PCBs Y ☒ N Pesticides Y ☒ N

As defined in 40 CFR 268: () Non-wastewater (X) Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y ☐ N ☐ Color:

RCRA/ACT 64 WASTE CHARACTERIZATION

Is this a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes ☐ No ☒

If yes, list all waste codes:

Is this a non-hazardous waste as defined by Michigan Act 136: Yes ☒ No ☐

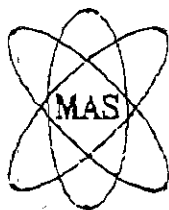
If yes, list all waste codes: 029L

Does this waste contain a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

No ☒ * Unknown ☐

If yes, list all waste codes:

Based on generator knowledge, please read and understand certification in Section VI



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Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P: 1-800-801-4MAS (MI, OH, WI, IN, IL)
: (313) 964-3680
F: (313) 964-2339

Date : 25-Jun-96
Client : MOLLY DWINNELLS
DYNECOL, INC.
Mass# : 60613017
PROJECT: : PARKER AMCHEM
Sample ID. : 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the quality control and quality assurance criteria specified by the American Association of Laboratory Accreditation/SW 846/MDNR/WDNR and EPA references from 40 CFR part 136 guidelines.

For your convenience the following legend applies to all the following data sheets:

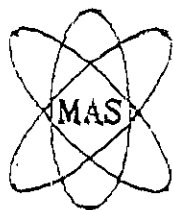
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2. N/D=Not detected above Estimated Quantitation Limit, N/A=Not applicable
3. Results relate only to the items tested.
4. mg/l, mg/kg, mg/kg(dry weight) equal ppm(parts per million)
μg/l, μg/kg, μg/kg(dry weight) equal ppb(parts per billion)

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



Midwest Analytical Services, Inc.

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2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P: 1-800-801-4MAS (MI, OH, WI, IL)
(313) 964-3680
F: (313) 964-2339

IN: SMR

TEST REPORT

MAS #: 60613017

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 25-Jun-96
P.O. #: 115-2396

PROJECT: PARKER AMCHEM

SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55 6/12/96

PHYSICAL DESCRIPTION: LIQUID

FILE: WASTE \WCTC

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL
SW-846 1010	IGNITIBILITY	> 200	°F	---	< 140 D001	SS	06/18/96
SW-846 9045C	pH / CORROSIVITY	8.28	UNITS	---	<2 : >12.5 D002	BB	06/20/96
	REACTIVITY:					BB	06/19/96
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003		
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	20	500 D003		
SW-846 8080A	PCB:		mg/kg		---	AAT	06/24/96
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
	AROCLOR 1248	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
SW-846	TCLP METALS (1311):		mg/l				
6010A	ARSENIC	N/D		1.0	5.0 D004	KRW	06/20/96
6010A	BARIUM	21		10	100.0 D005	KRW	06/20/96
6010A	CADMIUM	N/D		0.50	1.0 D006	KRW	06/20/96
6010A	CHROMIUM	N/D		1.0	5.0 D007	KRW	06/20/96
6010A	COPPER	N/D		1.0	100.0 001D (MDNR)	KRW	06/20/96
6010A	LEAD	N/D		1.0	5.0 D008	KRW	06/20/96
7470A	MERCURY	N/D		0.10	0.2 D009	DJP	06/19/96
6010A	SELENIUM	N/D		0.50	1.0 D010	KRW	06/20/96
6010A	SILVER	N/D		1.0	5.0 D011	KRW	06/20/96
6010A	ZINC	N/D		5.0	500.0 003D (MDNR)	KRW	06/20/96

*SAMPLE pH MEASURED IN WATER AT 23.6°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager

2955

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7191

Recertification (Y) N

WASTE APPROVAL FORM

Approval # 102417.6

Code 1390

I GENERAL INFORMATION	
Customer: <u>HENKEL SURFACE TECHNOLOGIES</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(810) 553-9300</u> Fax: <u>(810) 559-4534</u>	Phone #: <u>(810) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 124</u>

II WASTE DESCRIPTION	
Waste Common Name: <u>WASTE THERMINOL SS</u>	
Specific Process Generating the Waste: <u>THERMINOL FROM HEAT EXCHANGER</u>	

WASTE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAX.
<u>THERMINOL</u>	<u>100</u>		

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y <u>(N)</u>	Oxidizer	Y <u>(N)</u>	Organics	Y <u>(N)</u>	Explosives	Y <u>(N)</u>	Phenols	Y <u>(N)</u>	Hexavalent Chromium	Y <u>(N)</u>
Radioactives	Y <u>(N)</u>	Poison	Y <u>(N)</u>	PCBs	Y <u>(N)</u>	Pesticides	Y <u>(N)</u>				

As defined in 40 CFR 268: (X) Non-wastewater () Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: (Y) Color: BROWN

III RCRA/ACT 64 WASTE CHARACTERIZATION	
This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes _____ No <u>X</u>	
If yes, list all waste codes: _____	
This is a non-hazardous waste as defined by Michigan Act 136: Yes <u>X</u> No _____	
If yes, list all waste codes: <u>021 L</u>	
his waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:	
Yes _____	No <u>X</u> Unknown _____
If yes, list all waste codes: _____	
- If based on generator knowledge, please read and understand certification in Section VI	

IV SHIPPING INFORMATION

Waste Volume: 5-10 LITERS (circle one) GALLONS POUNDS DRUMS OTHER _____
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous Liquid

DOT Hazard Class: _____ UNNA Number: _____ Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

9 / 9 / 97

Date

George J. Beyer

Generator Signature

Technical Manager

Title

II WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, SFOCs (Method 9020), Nickel and Thallium
- ICLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

Approval #: 102417.6

Treatment Facility: ② CMF: ✓

Approved by: _____ Date: _____

Expiration date: 9/30/98



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No. (313) 964-2339

Date : 19-Sep-97
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 70910017
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample ID. : 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.
2. N/D=Not detected.
3. Results relate only to the items tested.
4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, μ g/l, μ g/kg or μ g/kg(dry weight)
5. QC information on file.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You.

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



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Detroit, Michigan 48201

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IN: NWB

TEST REPORT

MAS #: 70910017

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 19-Sep-97
P.O. #: 115-3269

PROJECT: HENKEL SURFACE TECHNOLOGIES
SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55
PHYSICAL DESCRIPTION: LIQUID
Sample Date: 09-Sep-97

FIELD WASTE DYNECOL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IDENTIFIABILITY	> 200	PP	---	1500 0001	EDH	10-18-97
SW-846 9045C	PH & CORROSIVITY	3.58	UNITS	---	ND 1 110.5 0001	DC	10-18-97
	REACTIVITY:					DC	10-18-97
SW-846 7.3.3.2	REACTIVE OXIDE	N/D	mg/kg	10	100 0000		
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	10	100 0000		
SW-846 9020BM	TOTAL MERCURY ELEMENTAL	---	---	---	---		
SW-846 8080A	PCB:		mg/kg	---	---	DCB	10-18-97
	AROCLOR 1018	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1248	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
SW-846	TCLP METALS (1311):		mg/L			KAN	10-18-97
6010A	ARSENIC	N/D		1.0	5.0 0004		
6010A	BARIUM	N/D		5.0	100.0 0005		
6010A	CADMIUM	N/D		0.50	1.0 0006		
6010A	CHROMIUM	N/D		1.0	5.0 0007		
6010A	COPPER	1.1		1.0	100.0 0010 (MDNR)		
6010A	LEAD	4.7		1.0	5.0 0008		
7470A	MERCURY	N/D		0.10	0.2 0009		
6010A	NICKEL	N/D		1.0	---		
6010A	SELENIUM	N/D		0.50	1.0 0010		
6010A	SILVER	N/D		1.0	5.0 0011		
6010A	THALLIUM	N/D		5.0	---		
6010A	ZINC	9.0		5.0	500.0 003D (MDNR)		

* SAMPLE PH MEASURED IN WATER AT 19.2°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager

FINDING NUMBERS TWO (2), THREE (3), & SEVEN (7)

- WEEKLY INSPECTIONS (SAMPLES)
- MONTHLY HOUSEKEEPING INSPECTIONS (SAMPLES)
- UPDATED HAZARDOUS WASTE PROGRAM
- PICTURES:
 - PROPERLY MARKED UP LABEL
 - SATELLITE ACCUMULATION AREA
 - HAZARDOUS WASTE STORAGE AREA

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 5/25/99 Time: 9:00 AM
 Inspected By: C. CONRAD
 (Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	✓	
Proper Labeling		✓
Lids Secure	✓	
Segregation of Incompatibles	✓	
Accessibility and Aisle Clearance	✓	
Stacking (2 High Maximum)	✓	
Floor Condition (Spills, cracks, etc.)	✓	

Corrective Action Required: Used DZ Resin not dated and NO
papers, Misc. boxes no labels, Chrome bottles
in cage no date or contact person on bottles.

Corrective Action Taken - Record Date and Description:

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 6/14/99 Time: 10:30 AM

Inspected By: *[Signature]*
(Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	<u>✓</u>	<u></u>
Proper Labeling	<u></u>	<u>✓</u>
Lids Secure	<u>✓</u>	<u>✓</u>
Segregation of Incompatibles	<u>✓</u>	<u></u>
Accessibility and Aisle Clearance	<u>✓</u>	<u></u>
Stacking (2 High Maximum)	<u>✓</u>	<u></u>
Floor Condition (Spills, cracks, etc.)	<u></u>	<u>✓</u>

Corrective Action Required: Trace waste needs labels
& one trace seal container has loose lid
some spills on pallets in front.
none of the containers have "HAZARDOUS WASTE"
stickers

Corrective Action Taken - Record Date and Description:

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 7/22/99 Time: _____
 Inspected By: [Signature]
 (Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	<u>✓</u>	
Proper Labeling		<u>✓</u>
Lids Secure	<u>✓</u>	
Segregation of Incompatibles	<u>✓</u>	
Accessibility and Aisle Clearance	<u>✓</u>	
Stacking (2 High Maximum)	<u>✓</u>	
Floor Condition (Spills, cracks, etc.)	<u>✓</u>	

Corrective Action Required: drum not labeled.

Corrective Action Taken - Record Date and Description:
filled out information

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 8/14/99 Time: _____
 Inspected By: Tom Shell (Signature)

Check (√) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	✓	
Proper Labeling	✓	
Lids Secure	✓	
Segregation of Incompatibles	✓	
Accessibility and Aisle Clearance		✓
Stacking (2 High Maximum)	✓	
Floor Condition (Spills, cracks, etc.)	✓	

Corrective Action Required: move (2) 55 gallon
drums -

Corrective Action Taken - Record Date and Description:

Complete

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 9/22/99 Time: 10:02 A.M.
 Inspected By: [Signature]
 (Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	✓	
Proper Labeling		✓
Lids Secure	✓	
Segregation of Incompatibles		✓
Accessibility and Aisle Clearance	✓	
Stacking (2 High Maximum)	✓	
Floor Condition (Spills, cracks, etc.)	✓	

Corrective Action Required: boxes are stacked haphazardly
no labels on some chemicals
boxes mixed with acids on some pallet

Corrective Action Taken - Record Date and Description:

[Signature]

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 10-21-99 Time: 9:45 AM
 Inspected By: Chuck Caldwell
 (Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	<u>x</u>	
Proper Labeling	<u>x</u>	
Lids Secure	<u>x</u>	
Segregation of Incompatibles	<u>x</u>	
Accessibility and Aisle Clearance	<u>x</u>	
Stacking (2 High Maximum)	<u>x</u>	
Floor Condition (Spills, cracks, etc.)	<u>x</u>	

Corrective Action Required: _____
1-55G-6 UNKNOWN CHEMICAL (NO LID)
1-55G-3 POUR SPOUT IN DRUM

Corrective Action Taken - Record Date and Description:

① PULL SPOUT & REPLACE W/ LID
1-55G-3 10-21-99

②
15G 6
REMOVE & TREAT 10-21-99

**HAZARDOUS WASTE STORAGE AREA
WEEKLY INSPECTION LOG**

Inspection Date: 11-11-99 Time: 10-30-99
Inspected By: Chuck Caldwell
(Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA:	<u>Satisfactory</u>	<u>Unsatisfactory</u>
Container Appearance	<u>X</u>	<u></u>
Proper Labeling	<u></u>	<u>X</u>
Lids Secure	<u></u>	<u>X</u>
Segregation of Incompatibles	<u></u>	<u>X</u>
Accessibility and Aisle Clearance	<u>X</u>	<u></u>
Stacking (2 High Maximum)	<u>X</u>	<u></u>
Floor Condition (Spills, cracks, etc.)	<u>X</u>	<u></u>

Corrective Action Required: PRODUCTS NEED TO
BE LABELED PROPERLY

Corrective Action Taken - Record Date and Description:

FILLED OUT INCIDENT REPORT

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: 12-6-99 Time: 800-930
Inspected By: Chuck Caldwell
(Signature)

Check (✓) One

CONTAINERS, CONFIGURATION, AREA: Satisfactory Unsatisfactory

Container Appearance	<u>X</u>	<u></u>
Proper Labeling	<u>X</u>	<u></u>
Lids Secure	<u>X</u>	<u></u>
Segregation of Incompatibles	<u>X</u>	<u></u>
Accessibility and Aisle Clearance	<u>X</u>	<u></u>
Stacking (2 High Maximum)	<u>X</u>	<u></u>
Floor Condition (Spills, cracks, etc.)	<u>X</u>	<u></u>

Corrective Action Required: _____

Corrective Action Taken - Record Date and Description:

12-6-99
Pick up & LOAD WASTE
PRODUCT.

Attachment "A"

Bob Brubaker, Jr.
Inspected By

Feb 19, 1997
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input checked="" type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
| B. <input checked="" type="checkbox"/> Labs | I. <input checked="" type="checkbox"/> High Bay |
| C. <input checked="" type="checkbox"/> Paint Lab | J. <input checked="" type="checkbox"/> Paint Storage |
| D. <input type="checkbox"/> Waste Treatment | K. <input type="checkbox"/> Maintenance |
| E. <input checked="" type="checkbox"/> Autophoretic Line | L. <input checked="" type="checkbox"/> General Building |
| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- ① Training Lab, old parts piled up.
- Autophoretic Lab, Lub Lab ^{very} poor Housekeeping
- ② 5 gallon pail has leak (fixed ^{Garrett})
- ③ paint filter need to be changed
- ④ Legal area. very poor Housekeeping.

Corrective Actions:

- ① filter changed 3/26/97
- ④ Legal is still in poor condition

T. Smith
Inspected By

May 14, 1997
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|---|--|
| A. <input type="checkbox"/> Offices | H. <input type="checkbox"/> Chemical Storage Areas |
| B. <input type="checkbox"/> Labs | I. <input type="checkbox"/> High Bay |
| C. <input type="checkbox"/> Paint Lab | J. <input type="checkbox"/> Paint Storage |
| D. <input type="checkbox"/> Waste Treatment | K. <input type="checkbox"/> Maintenance |
| E. <input type="checkbox"/> Autophoretic Line | L. <input type="checkbox"/> General Building |
| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- ① Crib needs to be cleaned up.
- ② Dumpster area old pallets & boxes.
- ③ around filter press. some old filter cake.
- ④ Can line has 3 unlabeled pails.

Corrective Actions:

all corrected 6/24/97

Gary Krametsky, T.S.M.
Inspected By

Oct 22, 1997
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
| B. <input checked="" type="checkbox"/> Labs | I. <input checked="" type="checkbox"/> High Bay |
| C. <input checked="" type="checkbox"/> Paint Lab | J. <input checked="" type="checkbox"/> Paint Storage |
| D. <input checked="" type="checkbox"/> Waste Treatment | K. <input type="checkbox"/> Maintenance |
| E. <input type="checkbox"/> Autophoretic Line | L. <input type="checkbox"/> General Building |
| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- ① Drum not grounded, open funnel
- ② C84 - Chemical stored on bench.
- ③ High Bay looks good, need locking.

Corrective Actions:

- ① found open funnel again will talk to oxc
- ② Locking needs C.S.A.
- 11/12/97

T. Snell
Inspected By

3/27/98
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW . FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
| B. <input checked="" type="checkbox"/> Labs | I. <input checked="" type="checkbox"/> High Bay |
| C. <input checked="" type="checkbox"/> Paint Lab | J. <input checked="" type="checkbox"/> Paint Storage |
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| E. <input checked="" type="checkbox"/> Autophoretic Line | L. <input checked="" type="checkbox"/> General Building |
| F. <input checked="" type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input checked="" type="checkbox"/> Dumpster Area |

Comments:

- (B) Lab C86 - electrical Box with Exposed wires.
- (A) Some items had fallen off the Shelves.
- (D) Parts processing area needs to be cleaned up.
- (J) unlabeled 5 gallon pail in room.
- (L) Emergency lighting, needs to be checked.

Corrective Actions:

- (H) (B) Completed.
- (E) removed Dumpster from area.
- (L) monthly inspection. 4/21/98

George Komahie, T.E. II.
Inspected By

July 22, 1998
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
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| C. <input checked="" type="checkbox"/> Paint Lab | J. <input checked="" type="checkbox"/> Paint Storage |
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| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- (B) Storage of Samples is a problem.
- (D) North end Electrical Cord on 750 line.
Leaking Brackets 1030 drum (fix today).
- (C) Housekeeping poor, Solvent Rags on floor.
Solvent Container has open funnel

Corrective Actions:

- (B) add storage unit
- (D) removed Cord
- (C) talked to Supervisor 8/19/98

Tom S.H.
Inspected By

4/23/98
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
| B. <input checked="" type="checkbox"/> Labs | I. <input checked="" type="checkbox"/> High Bay |
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| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- (B) all laboratories could benefit from rigorous cleaning (fume hood (C-80 out of order))
- (E) open 5 gallon pail
- (D) old furniture stacked to High-

Corrective Actions:

- (B) housekeeping has improved, except C89, C69
- (E) not open during
- (D) furniture removed 12/14/98

Sean D. L. Ball
Inspected By

Jan 14, 99
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input type="checkbox"/> Offices | H. <input type="checkbox"/> Chemical Storage Areas |
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| E. <input checked="" type="checkbox"/> Autophoretic Line | L. <input checked="" type="checkbox"/> General Building |
| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

- ① C91 (3) 5 gallon pails unlabeled.
- Tenaxor, Housekeeping Poor.
- ② floor grid in front of tank 9, 10 loose.
- ③ paint filter in poor shape.
- ④ open spout in 55 gallon drum.

Corrective Actions:

- C91 - all containers labeled, tenaxor lab improved.
- ① ② ③ Complete. 2/16/99

al mundy, S.H.
Inspected By

May 18, 1999
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|--|---|
| A. <input checked="" type="checkbox"/> Offices | H. <input checked="" type="checkbox"/> Chemical Storage Areas |
| B. <input checked="" type="checkbox"/> Labs | I. <input checked="" type="checkbox"/> High Bay |
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| G. <input checked="" type="checkbox"/> Exterior | N. <input checked="" type="checkbox"/> Dumpster Area |

Comments:

- ② Customer turning Lab, Leaking Hot oil System.
- ④ Near Legal, Material poorly Stocked.
- ⑦ open shipping label drum.
- ungrounded drum.
- ③ Change paint filters.

Corrective Actions:

- ② Repair leaking in System.
- ④ area has been cleaned.
- ⑦ drums labeled, still not grounded.
- ③ Done.

6/24/99

Bob Binkley, J.S.H.
Inspected By

12/8/99.
Date

HOUSEKEEPING INSPECTIONS

KEY:

1. Floor free from slipping, tripping
2. Aisles, stair free of debris
3. Electrical panels, emergency equipment
4. Equipment not properly stored
5. Piled or stacked scrap or debris
6. Employees work areas

CHECK BOXES BELOW, FOR THE AREAS YOU INSPECTED

- | | |
|---|--|
| A. <input type="checkbox"/> Offices | H. <input type="checkbox"/> Chemical Storage Areas |
| B. <input type="checkbox"/> Labs | I. <input type="checkbox"/> High Bay |
| C. <input type="checkbox"/> Paint Lab | J. <input type="checkbox"/> Paint Storage |
| D. <input type="checkbox"/> Waste Treatment | K. <input type="checkbox"/> Maintenance |
| E. <input type="checkbox"/> Autophoretic Line | L. <input type="checkbox"/> General Building |
| F. <input type="checkbox"/> Storage Areas | M. <input type="checkbox"/> Other |
| G. <input type="checkbox"/> Exterior | N. <input type="checkbox"/> Dumpster Area |

Comments:

(H) South Storage area, needs to be cleaned.
(D) waste under filter press.
(N) paper around Dumpster.

Corrective Actions:

(H) Area improvement.
(D) (N) Both Complete.
1/7/00

HAZARDOUS WASTE PROGRAM

**HENKEL SURFACE TECHNOLOGIES
32100 Stephenson Highway
Madison Heights, Michigan 48071**

CONTENTS

- 1.0 INTRODUCTION
- 2.0 POLICY
- 3.0 PURPOSE
- 4.0 SCOPE
- 5.0 HAZARDOUS WASTE CLASSIFICATIONS
- 6.0 HAZARDOUS WASTE MANIFEST
- 7.0 HAZARDOUS WASTE HANDLING PROCEDURES
- 8.0 WASTE STORAGE LOG PROCEDURE
- 9.0 WASTE CLASSIFICATION PROCEDURE
- 10.0 HAZARDOUS WASTE STORAGE AREA PROCEDURE
- 11.0 HAZARDOUS WASTE MINIMIZATION
- 12.0 MISCELLANEOUS WASTE
- 13.0 HAZARDOUS WASTE TRAINING

Attachments

- Attachment "A" - Hazardous Waste Storage Area Weekly Inspection Log
- Attachment "B" - Hazardous Waste Drum Label
- Attachment "C" - Hazardous Waste Storage Log
- Attachment "D" - Hazardous Waste Manifest Example
- Attachment "E" - Listed Wastes and Characteristic Wastes
- Attachment "F" - EPA Regulations for Hazardous Waste Generators
- Attachment "G" - Training Requirements
- Attachment "H" - EPA ID Number
- Attachment "J" - Waste Characterization Checklist
- Attachment "K" - Waste Disposal Flow Chart

Date: January 29, 1999
Revised: December 20, 1999

1.0 INTRODUCTION

The Environmental Protection Agency has created laws that regulate the management of waste materials. These regulations are found in the Code of Federal Regulations in 40 CFR, Part 261 through Part 265 and include the identification and handling of hazardous wastes and accumulation times as well as the training involved to comply with the applicable regulations.

The Resource Conservation and Recovery Act (RCRA) is the primary law that regulates the management of these waste materials, labeled "solid" wastes. By definition, a solid waste is any material that is to be "discarded", that is, by being recycled, incinerated, or disposed of by other methods.

A material becomes a solid waste when the generator determines that the material does not have a useful purpose, that is, the purpose for which it was produced. Physically, solid wastes may be solids, liquids, semi-solids, or contained gaseous materials.

Solid wastes include both hazardous and non-hazardous waste. Hazardous wastes may be a "listed waste" or a "characteristic waste".

2.0 POLICY

All hazardous wastes will be managed through the use of procedures and systems to protect our employees, the public and the environment. These wastes will be handled in accordance with the applicable regulations.

3.0 PURPOSE

- A. To establish procedures, inspections and systems to ensure safe and proper handling of all hazardous wastes in a manner that protects plant personnel, the community and the environment.
- B. Evaluation of all hazardous waste streams to identify opportunities to maximize waste reduction using a decision hierarchy of Reduce, Rework or Recycle.
- C. Compliance with all applicable Federal, State, and local hazardous waste regulations.

4.0 **SCOPE**

This procedure applies to the Henkel Surface Technologies' Madison Heights facility.

5.0 **HAZARDOUS WASTE CLASSIFICATIONS**

- A. Listed Wastes - "F" or generic (or non-specific) wastes which are always hazardous wastes, "K" wastes which are hazardous only if generated by specific sources, and "P" and "U" or discarded commercial chemical products which are hazardous as defined at 40 CFR 261.31 - 261.33.
- B. Characteristic Wastes - Ignitibility, Corrosivity, Reactivity and Toxicity defined at 40 CFR 261.21 - 261.24.

(See Attachment E)

5.1 **Definitions**

- A. Large Quantity Generator (LQG) - Generates 1,000 (2,200 lbs) or more kg/month of hazardous waste.
- B. Small Quantity Generator (SQG) - Generates 100 - 1000 (220 - 2,200 lbs) kg/month hazardous waste.
- C. Generator Accumulation Time - LQG's may not accumulate hazardous waste on-site for more than 90 days without a permit.
- D. E.P.A. Identification Number - Each facility or entity that generates, treats, stores, ships, transports, or disposes of hazardous waste must be registered with the E.P.A. and obtain a facility E.P.A. ID Number. This facility E.P.A. ID Number is used on all manifests involving shipments of hazardous materials, as well as periodic regulatory reports. (See Attachment H)
- E. Manifest - Each facility that transports, or offers for transportation, hazardous wastes, must fill out a Manifest similar to E.P.A. form 8700-22.
(See Attachment D)
- F. Waste Generator - This is any Chemist, Technician, Manager, Technical Service, Maintenance or Sales person who generates chemical waste materials.
- G. Representative Sample - This a sample that truly represents the contents of a container of waste (i.e. If solid, a sample taken by use of a drum thief; If liquid, a sample taken by use of a Coliwasa or equivalent). A one pint sample is usually required.

- H. Waste Storage/Staging Area - This is an area designated as a secured and diked waste storage area. Currently this area is the north-west corner of the autophoretic line high bay area.
- I. Water Soluble, Treatable Chemical - If a water soluble chemical does not respond to the waste treatment cycle described here, the chemical cannot be discharged into the drain.
 - a. The Madison Heights treatment system consists of acidification, hexavalent chromium reduction followed by pH adjustment with calcium chloride plus caustic and finally flocculation and clarification.

6.0 **HAZARDOUS WASTE MANIFEST**

- 6.1 If the State to which the shipment is manifested supplies the manifest, then the generator must use that manifest.
- 6.2 If the State to which the shipment is manifested does not supply the manifest, but the State in which the generator is located supplies the manifest, then the generator must use that State's manifest.
- 6.3 Otherwise the form to be used is the Uniform Hazardous Waste Manifest form E.P.A. Form 8700-22.
- 6.4 The manifest must consist of at least enough copies to provide one each to the following:

- The generator
 - Each transporter
 - Owner and/or Operator of the designated facility
 - Returned copy to generator

- 6.5 The facility receiving the hazardous waste shipment must return a signed copy of the manifest to the generator within 30 days. If a signed copy is not received within 35 days, the transporter and/or receiving facility must be contacted. If a signed copy is not received within 45 days, an Exception Report must be filled out and submitted to the E.P.A. Regional administrator.

Note: A state may designate a particular copy to be returned or may routinely return a copy to the applicable state agency.

(See Attachment F)

- | | |
|----------------------------|-----------------------------|
| f. Oil Emulsions | Satellite Accumulation Area |
| g. Chrome/Organic | Satellite Accumulation Area |
| h. Epoxy/Acrylic | Satellite Accumulation Area |
| i. Autophoretic 800 Series | Satellite Accumulation Area |
4. Wastes, other than those previously described, can be divided into two broad categories: A.) Drummed Wastes and B.) Lab Pack Wastes. Each of these categories are handled differently. Refer to the Flow Chart in (Attachment "J") to determine the appropriate disposal process for your specific waste.
 5. The first waste disposal decision is made based on the volume of your specific waste.
 - a. Small Waste Volume - Determine if the waste fits the "profile" of one of the waste types listed above in the hazardous waste storage areas. If Yes - Add it to the Accumulation drum and complete the information on that Drum Log Sheet. If No - Transfer material to the Lab Pack Storage area. Provide completed Profile Sheet and MSDS, if available.
 - b. Large Waste Volume - (>5 gallons) Determine if the waste is a previously characterized waste stream. The Lab Waste Manager can provide this information. If Yes - Request a temporary drum label, drum ID number and permission to move drum(s) to the appropriate Hazardous Waste Storage area. If No - Complete a "Waste Characterization Checklist" and submit it to the Lab Waste Manager along with a "Representative Sample".
 6. The Facility Manager will coordinate the removal and disposal of generated wastes as follows:
 - a. Previously Characterized Waste - These are waste streams which have approval numbers and can be shipped off-site to specific disposal sites based on previous obtained characterizations and approvals. The Facility Manager will contact the disposal agent to arrange for shipment labels, manifests, pick-up and disposal.
 - b. New Waste Stream - For new waste streams, the submitted "Representative Sample" and the "Waste Characterization Checklist" are sent to or picked up by the disposal agent. When an approval is obtained from the disposal site the Facility Manager will make arrangements with the disposal agent for shipment labels, manifests, pick-up and disposal.

7. Lab Pack Waste - Several times a year (every 1 ½ months), a Lab Pack Day will be scheduled. All generators will be notified of the day, time and place. All lab Pack Materials not already moved into the Lab Pack holding area within the Hazardous Waste Storage Area may be brought to the area at this time, provided the proper documentation is attached to the waste (completed Profile Sheet, MSDS and approval from Facility Manager). All waste materials will be separated, itemized, packed, labeled, manifested and picked up for disposal by the lab pack disposal firm.
8. Generators are required to immediately notify the Laboratory Waste Manager if there is any question about whether a waste is hazardous or not. The material must be in or put into an appropriate DOT approved container. The container must be clean, dry, and properly labeled as to contents and weight. "Different" waste types are not to be combined in the same container.
9. The generator and/or mover of waste containers should inspect the container(s) and materials prior to transfer to the appropriate Hazardous Waste Storage Area. After the material is moved into the Hazardous Waste Storage Area, contact the Facility Manager or assigned representative who will fill out a permanent hazardous waste label and place on the container(s). A sequential drum ID number is recorded in the Hazardous Waste Storage Log Book and is placed on each drum.
10. The appropriate material identification and accumulation information will be entered in the Hazardous Waste Storage Log Book. The material should be disposed of within 90 days. The log book is kept in the Hazardous Waste Storage Area. A copy of a Hazardous Waste Log Sheet is attached (See Attachment "C").
11. Solid waste must be in open head drums or containers.
12. Liquid waste must be in closed head drums or containers.
13. Bulged or severely rusted or damaged drums or containers cannot be shipped. Therefore, the contents must be transferred to a shippable drum or container or put into an overpack drum or container.
14. Frozen waste cannot be shipped.
15. Some waste streams require special handling and will be handled on an individual basis (i.e. mercury, radioactive waste).
16. Material cannot be stacked higher than two high. Pallets must be spaced at least 18 inches apart from each other to allow for inspection.

17. Weekly inspections are to be conducted of the area by facility personnel. A copy of the Weekly Inspection form is attached (See Attachment "A").

B. Shipping

1. Arrangements are made for material disposal by the Facility Manager, who is responsible for contacting the appropriate vendor.
2. Properly completed Manifests and Land Ban Certifications are prepared and approved.
3. The containers are staged for shipment. Verification is made that the proper Hazardous Waste and DOT shipping labels are on each drum.
4. When the transport truck arrives, a final cross-check is performed comparing the Material Disposal List to the manifest.
5. When complete and satisfactory, all documentation is approved for shipment. The truck is then loaded.
6. The Hazardous Waste Storage Log Book is then updated. Documentation is filed and the State copy of the manifest (if applicable) is mailed on the date of shipment.
7. All documentation must be kept for a minimum of three years.

7.3 Responsibilities

<u>Actions</u>	<u>Suggested Responsibility</u>
1. A waste characterization form should first be filled out and a representative sample taken for analysis at a laboratory or at the waste disposal site.	Waste Generator
2. Move or arrange for transfer of waste material to the waste storage area and log entries into the hazardous waste storage log.	Waste Generator
3. Attach a "hazardous waste" or a "nonhazardous waste" label to each drum.	Facility Manager or assigned rep
4. Write the drum number from the log on the drum.	Facility Manager or assigned rep

- | | |
|---|---|
| 5. Complete the Hazardous Waste Storage Area Weekly Inspection log. | Facility Manager/
Designee |
| 6. Arrange for drum disposal. | Facility Manager/
Designee |
| 7. Prepare a drum disposal list. | Facility Manager/
Designee |
| 8. Arrange for properly completed manifests and appropriate Land Ban Certification. | Facility Manager/
Designee |
| 9. Stage drums for shipment. | Operator or Shipper |
| 10. Load drums onto transport truck. | Shipper |
| 11. Perform cross-check of manifest to disposal list. | Shipper |
| 12. Sign all paperwork and okay shipment. | Facility Manager/
Designee |
| 13. File paperwork (Mail copy to state). | Facility Manager/
Designee |
| 14. Update the Hazardous Waste Storage Log to reflect the date of shipment. | Facility Manager/
Designee |
| 15. Verify return receipt of manifest copy and file with other paperwork. | Facility Manager/
Designee |
| 16. Biennial, and state reports, if applicable | Facility Manager/
Mgr. Env. & Safety |
| 17. Maintain all records for at least three (3) years. | Facility Manager/
Designee |

8.0 WASTE STORAGE LOG PROCEDURE

1. The Facility Manager/Designee has the responsibility for maintaining the Hazardous Waste Storage Log. The log will always be kept in the Hazardous Waste Storage Area.
2. The Facility Manager Designee will log entries into the Hazardous Waste Storage Log book when hazardous waste is brought to the waste area. The log book should not be removed from this area without permission of the Facility Manager/Designee.

9.0 WASTE CLASSIFICATION PROCEDURE

- A. Wastes will be classified by comparing the material to:
 1. Dynecol's Waste Disposal Approval List, or
 2. Other local waste disposal companies' requirements.
- B. If the waste matches one of the approved descriptions or profiles, use that description along with the generic waste title (i.e. product, raw material, etc....)
- C. If there is no current approved "waste description or profile", a sample will have to be submitted to the appropriate company for approval prior to shipping the "new waste".
- D. All active profiles will be kept up to date. The certification for each profile will be renewed periodically as applicable.
- E. Copies of Waste Profiles, Waste Analyses, and Land Ban Certification should be maintained for a minimum of 3 (three) years.

Note: RAPA must approve the usage of all disposal companies receiving waste materials.

10.0 HAZARDOUS WASTE STORAGE AREA PROCEDURE

- A. Waste that is stored within the Hazardous Waste Storage Area comes from the following sources:
 1. Plant spills and clean-ups.
 2. Raw materials or finished products with obsolete and/or expired shelf-life.
 3. Mismanufactured products.
 4. Sales/Customer Trials
 5. Discontinued or contaminated laboratory chemicals.

- B. The area will be clearly identified and adequate (18") aisle space must be maintained to allow for visual inspection of and access to all containers within the area.
- C. Weekly inspections of the area will be conducted to look for damaged or leaking containers, proper aisle spacing, labeling, etc. (See Attachment "A").
- D. The Facility Manager will assign the responsibility for conducting the weekly inspections. Each inspection report will be reviewed by the Facility Manager and any corrective actions required will be addressed in an expeditious manner. Each inspection report must be signed by the person conducting the inspection.
- E. All Inspection Reports will be kept in the Hazardous Waste binder in the Facility Manager's Office and kept on file for a minimum of three years.

11.0 HAZARDOUS WASTE MINIMIZATION

- A. Periodic management and engineering reviews will be conducted on all waste producing operations to determine if the opportunity exists to minimize the amount of waste produced. Each waste should be evaluated using the waste reduction hierarchy of Reduce, Reuse and Recycle.
- B. The Facility Manager will review any employee suggestions on reducing wastes and determine if it is feasible to pursue based on operating limitations and/or budgets.
- C. All reviews should be documented and kept on file for a minimum of three (3) years.

12.0 MISCELLANEOUS WASTE

- A. Fluorescent lights will be recycled at least every 12 months.
- B. Batteries are managed to prevent breakage, spills or releases to the environment and are recycled.
- C. Paint filters will be properly disposed of according to waste profile.

13.0 HAZARDOUS WASTE TRAINING**A. Training:**

1. This program is conducted by a person trained in hazardous waste management procedures either by education or prior work experience. (See Attachment G)

B. Training Content:

1. Identity of hazardous and non-hazardous wastes.
2. Properties of hazardous wastes.
3. Use of personal protective equipment.
4. Handling of specific hazardous wastes.
5. Packaging procedures.
6. On-site or off-site transportation requirements.
7. Recordkeeping requirements.
8. Emergency response procedures.

C. Employees:

1. New employees will be trained within the first six months of employment or job assignment.
2. Training will be conducted on an annual basis for all employees.

All information regarding job title, job description, the amount and type of initial training is provided under employee orientation as new employee hiring procedures. Continued training will be documented per training session.

Attachments

Attachment "A" - Hazardous Waste Storage Area Weekly Inspection Log

Attachment "B" - Hazardous Waste Drum Label

Attachment "C" - Hazardous Waste Storage Log

Attachment "D" - Hazardous Waste Manifest Example

Attachment "E" - Listed Wastes and Characteristic Wastes

Attachment "F" - EPA Regulations for Hazardous Waste Generators

Attachment "G" - Training Requirements

Attachment "H" - EPA ID Number

Attachment "J" - Waste Characterization Checklist

Attachment "K" - Waste Disposal Flow Chart

ATTACHMENT “A”

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION LOG

Inspection Date: _____ Time: _____

Inspected By: _____
(Signature)

Check (√) One

CONTAINERS, CONFIGURATION, AREA: Satisfactory Unsatisfactory

Container Appearance _____ _____

Proper Labeling _____ _____

Lids Secure _____ _____

Segregation of Incompatibles _____ _____

Accessibility and Aisle Clearance _____ _____

Stacking (2 High Maximum) _____ _____

Floor Condition (Spills, cracks, etc.) _____ _____

Corrective Action Required: _____

Corrective Action Taken - Record Date and Description:

ATTACHMENT “B”

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

EPA / MANIFEST
ID NO. / DOCUMENT NO. _____ / _____

ACCUMULATION
START DATE _____ EPA
WASTE NO. _____

O.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM6

Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800) 621-5808

ATTACHMENT “C”

ATTACHMENT “D”



DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969

Please print or type.

Form Approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address						A. State Manifest Document Number MI 3934010											
						B. State Generator's ID											
4. Generator's Phone ()				6. US EPA ID Number		C. State Transporter's ID											
5. Transporter 1 Company Name						D. Transporter's Phone											
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID											
						F. Transporter's Phone											
9. Designated Facility Name and Site Address						10. US EPA ID Number		G. State Facility's ID									
								H. Facility's Phone									
11. US DDT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.		N/H			
a.																	
b.																	
c.																	
d.																	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above						a/ /					
												b/ /					
												c/ /					
												d/ /					
15. Special Handling Instructions and Additional Information																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.																	
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name						Signature						Date					
												Month Day Year					
17. Transporter 1 Acknowledgement of Receipt of Materials												Date					
Printed/Typed Name						Signature						Month Day Year					
												Month Day Year					
18. Transporter 2 Acknowledgement of Receipt of Materials												Date					
Printed/Typed Name						Signature						Month Day Year					
												Month Day Year					
19. Discrepancy Indication Space																	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.														Date			
Printed/Typed Name						Signature						Month Day Year					
												Month Day Year					

EPA Form 8700-22 (Rev. 9/88)

To be mailed by
Generator to:

Michigan DNR
Box 30038

PR 5110
Rev. 10/94

AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

S MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN 1-800-424-AR02 24 HOURS PER DAY.

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ATTACHMENT “E”

§ 261.11 Criteria for listing hazardous waste.

(a) The Administrator shall list a solid waste as a hazardous waste only upon determining that the solid waste meets one of the following criteria:

(1) It exhibits any of the characteristics of hazardous waste identified in Subpart C.

(2) It has been found to be fatal to humans in low doses or, in the absence of data on human toxicity, it has been shown in studies to have an oral LD 50 toxicity (rat) of less than 50 milligrams per kilogram, an inhalation LC 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity (rabbit) of less than 200 milligrams per kilogram or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible, illness. (Waste listed in accordance with these criteria will be designated Acute Hazardous Waste.)

(3) It contains any of the toxic constituents listed in Appendix VIII and, after considering the following factors, the Administrator concludes that the waste is capable of posing a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed:

(i) The nature of the toxicity presented by the constituent.

(ii) The concentration of the constituent in the waste.

(iii) The potential of the constituent or any toxic degradation product of the constituent to migrate from the waste into the environment under the types of improper management considered in paragraph (a)(3)(vii) of this section.

(iv) The persistence of the constituent or any toxic degradation product of the constituent.

(v) The potential for the constituent or any toxic degradation product of the constituent to degrade into non-harmful constituents and the rate of degradation.

(vi) The degree to which the constituent or any degradation product of the constituent bioaccumulates in ecosystems.

(vii) The plausible types of improper management to which the waste could be subjected.

(viii) The quantities of the waste generated at individual generation sites or on a regional or national basis.

(ix) The nature and severity of the human health and environmental damage that has occurred as a result of the improper management of wastes containing the constituent.

(x) Action taken by other governmental agencies or regulatory programs based on the health or environmental hazard posed by the waste or waste constituent.

(xi) Such other factors as may be appropriate.

Substances will be listed in Appendix VIII only if they have been shown in scientific studies to have toxic, carcinogenic, mutagenic or teratogenic effects on humans or other life forms.

(Wastes listed in accordance with these criteria will be designated Toxic wastes.)

(b) The Administrator may list classes or types of solid waste as hazardous waste if he has reason to believe that individual wastes, within the class or type of waste, typically or frequently are hazardous under the definition of hazardous waste found in section 1004(5) of the Act.

(c) The Administrator will use the criteria for listing specified in this section to establish the exclusion limits referred to in §261.5(c).

Subpart C -- Characteristics of Hazardous Waste

§ 261.20 General.

(a) A solid waste, as defined in §261.2, which is not excluded from regulation as a hazardous waste under §261.4(b), is a hazardous waste if it exhibits any of the characteristics identified in this subpart.

(b) A hazardous waste which is identified by a characteristic in this Subpart is assigned every EPA Hazardous Waste Number that is applicable as set forth in this Subpart. This number must be used in complying with the notification requirements of section 3010 of the Act and all applicable recordkeeping and reporting requirements under Parts 262 through 265, 268, and 270 of this chapter.

(c) For purposes of this subpart, the Administrator will consider a sample obtained using any of the applicable sampling methods specified in Appendix I to be a representative sample within the meaning of Part 260 of this chapter.

§ 261.21 Characteristic of ignitability.

(a) A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:

(1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60°C (140°F), as determined by a Penak-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79 or D-93-80 (incorporated by reference, see §260.11), or a Setflash Closed Cup Tester, using the test method specified in ASTM Standard D-3278-78 (incorporated by reference, see §260.11), or as determined by an equivalent test method approved by the Administrator under procedures set forth in §§260.20 and 260.21.

(2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

(3) It is an ignitable compressed gas as defined in 49 CFR 173.300 and as determined by the test methods described in that regulation or equivalent test methods approved by the Administrator under §§260.20 and 260.21.

(4) It is an oxidizer as defined in 49 CFR 173.151.

(b) A solid waste that exhibits the characteristic of ignitability has the EPA Hazardous Waste Number of D001.

§ 261.22 Characteristic of corrosivity

(a) A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

(1) It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using either an EPA test method or an equivalent test method approved by the Administrator under the procedures set forth in §§260.20 and 260.21. The EPA test method for pH is specified as Method 5.2 in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference, see §260.11).

(2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55° C (130°F) as determined by the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" (incorporated by reference, see §260.11) or an equivalent test method approved by the Administrator under the procedures set forth in §§260.20 and 260.21.

(b) A solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste in Subpart D, has the EPA Hazardous Waste Number of D002.

§ 261.23 Characteristic of reactivity

(a) A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has any of the following properties:

(1) It is normally unstable and readily undergoes violent change without detonating.

(2) It reacts violently with water.

(3) It forms potentially explosive mixtures with water.

(4) When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.

(5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.

(6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement.

(7) It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

(8) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.58.

(b) A solid waste that exhibits the characteristic of reactivity has the EPA Hazardous Waste Number of D003.

§ 261.24 Toxicity characteristics

(a) A solid waste exhibits the characteristic of toxicity if, using the test methods described in Appendix II or equivalent methods approved by the Administrator under the procedures set forth in §§260.20 and 260.21, the extract from a representative sample of the waste contains any of the contaminants listed in Table 1 at the concentration equal to or greater than the respective value given in that Table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering using the methodology outlined in Appendix II, is considered to be the extract for the purpose of this section.

(b) A solid waste that exhibits the characteristic of toxicity has the EPA Hazardous Waste Number specified in Table 1 which corresponds to the toxic contaminant causing it to be hazardous.

Table 1 - Maximum Concentration of Contaminants for the Toxicity Characteristic

EPA HW No. ¹	Contaminant	CAS No. ²	Regulatory Level (mg/L)
D004	Arsenic.....	7440-38-2	5.0
D005	Barium.....	7440-39-3	100.0
D018	Benzene.....	71-43-2	0.5
D006	Cadmium.....	7440-43-9	1.0
D019	Carbon tetrachloride.....	56-23-5	0.5
D020	Chlordane.....	57-74-9	0.03
D021	Chlorobenzene.....	108-90-7	100.0
D022	Chloroform.....	67-66-3	5.0
D007	Chromium.....	7440-47-3	5.0
D023	o-Cresol.....	95-48-7	4200.0
D024	m-Cresol.....	108-39-4	4200.0
D025	p-Cresol.....	106-44-5	4200.0
D026	Cresol.....		4200.0
D016	2,4-D.....	94-75-7	10.0
D027	1,4-Dichlorobenzene.....	106-46-7	7.5
D028	1,2-Dichloroethane.....	107-06-2	0.5
D029	1,1-Dichloroethylene.....	75-35-4	0.7
D030	2,4-Dinitrotoluene.....	121-14-2	30.13
D012	Endrin.....	72-20-8	0.02
D031	Heptachlor (and its epoxide) ..	76-44-8	0.008
D032	Hexachlorobenzene.....	118-74-1	30.13
D033	Hexachlorobutadiene.....	87-68-3	0.5
D034	Hexachloroethane.....	87-72-1	3.0
D008	Lead.....	7439-92-1	5.0
D013	Lindane.....	58-89-9	0.4
D009	Mercury.....	7439-97-6	0.2
D014	Methoxychlor.....	72-43-5	10.0
D035	Methyl ethyl ketene.....	78-93-3	200.0
D036	Nitrobenzene.....	98-95-3	2.0
D037	Pentachlorophenol.....	87-86-5	100.0
D038	Pyridine.....	110-86-1	3 5.0
D010	Selenium.....	7782-49-2	1.0
D011	Silver.....	7440-22-4	5.0
D039	Tetrachloroethylene.....	127-18-4	0.7
D015	Texaphene.....	8001-35-2	0.5
D040	Trichloroethylene.....	79-01-6	0.5
D041	2,4,5-Trichlorophenol.....	95-95-4	400.0
D042	2,4,6-Trichlorophenol.....	68-06-2	2.0
D017	2,4,5-TP (Silvex).....	93-72-1	1.0
D043	Vinyl chloride.....	75-01-4	0.2

¹ Hazardous waste number.

² Chemical abstracts service number.

³ Quantitative limit is greater than the established regulatory level. The quantitative limit therefore becomes the regulatory level.

⁴ If o-, m-, and p-Cresol concentrations cannot be differentiated, the total must (D006) concentration is used. The regulatory level of total cresol is 500 mg/L.

Subpart D -- Lists of Hazardous Wastes [Interim Final]

§ 261.30 General

(1) A solid waste is a hazardous waste if it is listed in this Subpart, unless it has been excluded from this list under §§260.20 and 260.22.

(b) The Administrator will indicate his basis for listing the classes or types of wastes listed in this subpart by employing one or more of the following Hazard Codes:

Ignitable Waste.....(I)
Corrosive Waste.....(C)
Reactive Waste.....(R)

Toxicity Characteristic Waste.....(E)

Acute Hazardous Waste.....(H)

Toxic Waste.....(T)

Appendix VII identifies the constituent which caused the Administrator to list the waste as a Toxicity Characteristic Waste (E) or Toxic Waste (T) in §§261.31 and 261.32.

(c) Each hazardous waste listed in this Subpart is assigned an EPA Hazardous Waste Number which precedes the name of the waste. This number must be used in complying with the notification requirements of Section 3010 of the Act and certain recordkeeping and reporting

requirements under Parts 262 through 265, 268 and Part 270 of this Chapter.

(d) The following hazardous wastes listed in §261.31 or §261.32 are subject to the exclusion limits for acutely hazardous wastes established in §261.5: EPA Hazardous Wastes Nos. F020, F021, F022, F023, F026, and F027.

§ 261.31 Hazardous wastes from non-specific sources.

(a) The following solid wastes are listed hazardous wastes from non-specific sources unless they are excluded under §§260.20 and 260.22 and listed in Appendix IX.

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
Generic:		
F001.....	The following spent halogenated solvents used in degreasing: Tetrachloroethylene, tri-chloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F002.....	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, tri-chloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichloro-fluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F003.....	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	
F004.....	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; all spent solvent mixtures/blends containing before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
	The following spent non-halogenated solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxy-ethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(I, T)
F006.....	Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating carbon steel; and (6) chemical etching and milling of aluminum.	(T)
F019.....	Wastewater treatment sludges from the chemical conversion coating of aluminum except from zirconium phosphating in aluminum can washing when such phosphating is an exclusive conversion coating process.	(T) (R, T)
F007.....	Spent cyanide plating bath solutions from electroplating operations.	
F008.....	Plating sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process.	(R, T)
F009.....	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.	(R, T)
F010.....	Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process.	(R, T)
F011.....	Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations.	(R, T)
F012.....	Quenching wastewater treatment sludges from metal heat treating operations where cyanides are used in the process.	(T)
F024.....	Process wastes, including but not limited to, distillation residues, heavy ends, tars, and reactor clean-out wastes, from the production of certain chlorinated aliphatic hydrocarbons by free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to and including five, with varying amounts and positions of chlorine substitution. (This listing does not include wastewaters, wastewater treatment sludges, spent catalysts, and wastes listed in §261.31 or 261.32.)	(T)
F020.....	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- or tetrachlorophenol, or of intermediates used to produce their pesticide derivatives. (This listing does not include wastes from the production of Hexachlorophene from a highly purified 2,4,5-trichlorophenol.)	(H)
F021.....	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of pentachlorophenol, or of intermediates used to produce its derivatives.	(H)
F022.....	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzenes under alkaline conditions.	(H)
F023.....	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- and tetrachlorophenols. (This listing does not include wastes from equipment used only for the production or use of Hexachlorophene from highly purified 2,4,5-trichlorophenol.)	(H)

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
F026.....	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the manufacturing use (as a reactant chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzene under alkaline conditions.	(H)
F027.....	Discarded unused formulations containing tri-, tetra-, or pentachlorophenol or discarded unused formulations containing compounds derived from these chlorophenols. (This listing does not include formulations containing Hexachlorophene synthesized from pre-purified 2,4,6-trichlorophenol as the sole component.)	(H)
F028.....	Residues resulting from the incineration or thermal treatment of soil contaminated with EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027.	(T)
F025.....	Condensed light ends, spent filter and filter aids, and spent desiccant wastes from the production of certain chlorinated aliphatic hydrocarbons, by free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to and including five, with varying amounts and positions of chlorine substitution.	
F032 ¹	Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (except potentially cross-contaminated wastes that have had the F032 waste code deleted in accordance with §261.35 of this chapter and where the generator does not resume or initiate use of chlorophenolic formulations). This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.	(T)
F034 ¹	Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use creosote formulations. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol. (NOTE: The listing of wastewaters that have not come into contact with process contaminants is stayed administratively. The stay will remain in effect until further administrative action is taken.)	
F036 ¹	Wastewaters, process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol. (NOTE: The listing of wastewaters that have not come into contact with process contaminants is stayed administratively. The stay will remain in effect until further administrative action is taken.)	
F039.....	Leachate (liquids that have percolated through land disposed wastes) resulting from the treatment, storage, or disposal of wastes classified as hazardous under Subpart D or from a mixture of wastes classified under Subparts C and D of this part. (Leachate resulting from the management of one or more of the following EPA Hazardous Wastes and no other Hazardous Wastes retains its EPA Hazardous Waste Number(s): F020, F021, F022, F026, F027, and/or F028.)	(T)

¹ The F032, F034, and F036 listings are administratively stayed with respect to the process area receiving drippage of these wastes provided persons desiring to continue operating notify EPA by August 6, 1991 of their intent to upgrade or install drip pads, and by November 6, 1991 provide evidence to EPA that they have adequate financing to pay for drip pad upgrades or installation, as provided in the administrative stay. The stay of the listings will remain in effect until February 6, 1992 for existing drip pads and until May 6, 1992 for new drip pads.

*(I,T) should be used to specify mixtures containing ignitable and toxic constituents.

(b) Listing Specific Definitions: (1) For the purposes of the F037 and F038 listings, oil/water/solids is defined as oil and/or water and/or solids.

(2)(i) For the purposes of the F037 and F038 listings, aggressive biological treatment units are defined as units which employ one of the following four treatment methods: activated sludge; trickling filter; rotating biological contactor for the continuous accelerated biological oxidation of wastewaters; or high-rate aeration. High-rate aeration is a system of surface impoundments or tanks, in which intense mechanical aeration is used to completely mix the wastes, enhance biological activity, and (A) the unit employs a minimum of 6 hp per million gallons of treatment volume; and either (B) the hydraulic retention time of

the unit is no longer than 6 days; or (C) the hydraulic retention time is no longer than 30 days and the unit does not generate a sludge that is a hazardous waste by the Toxicity Characteristic.

(ii) Generators and treatment, storage and disposal facilities have the burden of proving that their sludges are exempt from listing as F037 and F038 wastes under this definition. Generators and treatment, storage and disposal facilities must maintain, in their operating or other onsite records, documents and data sufficient to prove that: (A) the unit is an aggressive biological treatment unit as defined in this subsection; and (B) the sludges sought to be exempted from the definitions of F037 and/or F038 were actually generated in the aggressive biological treatment unit.

(3)(i) For the purposes of the F037 listing, sludges are considered to be generated at the moment of deposition in the unit, where deposition is defined as at least a temporary cessation of lateral particle movement. (ii) For the purposes of the F038 listing, (A) sludges are considered to be generated at the moment of deposition in the unit, where deposition is defined as at least a temporary cessation of lateral particle movement and (B) floats are considered to be generated at the moment they are formed in the top of the unit.

§ 261.32 Hazardous wastes from specific sources.

The following solid wastes are listed hazardous wastes from specific sources unless they are excluded under §§ 260.20 and 260.22 and listed in Appendix IX.

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
Wood preservation: K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.	(T)
Organic pigments: J2	Wastewater treatment sludge from the production of chrome yellow and orange pigments.	(T)
K003	Wastewater treatment sludge from the production of molybdate orange pigments.	(T)
K004	Wastewater treatment sludge from the production of zinc yellow pigments.	(T)
K005	Wastewater treatment sludge from the production of chrome green pigments.	(T)
K006	Wastewater treatment sludge from the production of chrome oxide green pigments (anhydrous and hydrated).	(T)
K007	Wastewater treatment sludge from the production of iron blue pigments.	(T)
K008	Oven residue from the production of chrome oxide green pigments.	(T)
Organic chemicals:		
K009	Distillation bottoms from the production of acetaldehyde from ethylene.	(T)
K010	Distillation side cuts from the production of acetaldehyde from ethylene.	(T)
K011	Bottom stream from the wastewater stripper in the production of acrylonitrile.	(R,T)
K013	Bottom stream from the acetonitrile column in the production of acrylonitrile.	(R,T)
K014	Bottoms from the acetonitrile purification column in the production of acrylonitrile.	(T)
K015	Still bottoms from the distillation of benzyl chloride.	
K016	Heavy ends or distillation residues from the production of carbon tetrachloride.	(T)
K017	Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.	(T)
K018	Heavy ends from the fractionation column in ethyl chloride production.	(T)
K019	Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.	(T)
K020	Heavy ends from the distillation of vinyl chloride monomer production.	(T)
K021	Aqueous spent antimony catalyst waste from fluoromethanes production.	(T)
K022	Distillation bottom tars from the production of phenol/acetone from cumene.	(T)
K023	Distillation light ends from the production of phthalic anhydride from naphthalene.	(T)
K024	Distillation bottoms from the production of phthalic anhydride from naphthalene.	(T)
K093	Distillation light ends from the production of phthalic anhydride from ortho-xylene.	(T)
K094	Distillation bottoms from the production of phthalic anhydride from ortho-xylene.	(T)
K025	Distillation bottoms from the production of nitrobenzene by the nitration of benzene.	(T)
K026	Stripping still tails from the production of methyl ethyl pyridines, ethyl pyridines.	(T)
K027	Centrifuge and distillation residues from toluene diisocyanate production.	(R,T)
K028	Spent catalyst from the hydrochlorinator reactor in the production of 1,1,1-trichloroethane.	(T)
K029	Waste from the product steam stripper in the production of 1,1,1-trichloroethane.	(T)
K095	Distillation bottoms from the production of 1,1,1-trichloroethane.	(T)
K096	Heavy ends from the heavy ends column from the production of 1,1,1-trichloroethane.	(T)
K030	Column bottoms or heavy ends from the combined production of trichloroethylene and production of trichloroethylene and perchloroethylene.	(T)
K083	Distillation bottoms from aniline production.	(T)
K103	Process residues from aniline extraction from the production of aniline.	(T)
K104	Combined wastewater streams generated from nitrobenzene/aniline production.	(T)
K105	Distillation or fractionation column bottoms from the production of chlorobenzenes.	(T)
K106	Separated aqueous stream from the reactor product washing step in the production of chlorobenzenes.	(T)
K107	Column bottoms from product separation from the production of 1,1-dimethylhydrazine (UDMH) from carboxylic acid hydrazides.	(C,T)
K108	Condensed column overheads from product separation and condensed reactor vent gases from the production of 1,1-dimethylhydrazine (UDMH) from carboxylic acid hydrazides.	(I,T)
K109	Spent filter cartridges from product purification from the production of 1,1-dimethylhydrazine (UDMH) from carboxylic acid hydrazides.	(T)
K110	Condensed column overheads from intermediate separation from the production of 1,1-dimethylhydrazine (UDMH) from carboxylic acid hydrazides.	(T)
K111	Product washwaters from the production of dinitrotoluene via nitration of toluene.	(C,T)
K112	Reaction by-product water from the drying column in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K113	Condensed liquid light ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K114	Vicinals from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K115	Heavy ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K116	Organic condensate from the solvent recovery column in the production of toluene diisocyanate via phosgenation of toluenediamine.	(T)
K117	Wastewater from the reactor vent gas scrubber in the production of ethylene dibromide via bromination of ethene.	(T)
K118	Spent adsorbent solids from purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.	(T)
K136	Still bottoms from the purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.	(T)
Inorganic chemicals:		
K071	Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used.	(T)
K073	Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes in chlorine production.	(T)
K106	Wastewater treatment sludge from the mercury cell process in chlorine production.	(T)

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
Pesticides: K031	By-product salts generated in the production of MSMA and cacodylic acid.	(T)
K032	Wastewater treatment sludge from the production of chlordane.	(T)
K033	Wastewater and scrub water from the chlorination of cyclopentadiene in the production of chlordane.	(T)
K034	Filter solids from the filtration of hexachlorocyclopentadiene in the production of chlordane.	(T)
K087	Vacuum stripper discharge from the chlordane chlorinator in the production of chlordane.	(T)
K035	Wastewater treatment sludges generated in the production of creosote.	(T)
K036	Still bottoms from toluene reclamation distillation in the production of disulfoton.	(T)
K037	Wastewater treatment sludges from the production of disulfoton.	(T)
K038	Wastewater from the washing and stripping of phorate production.	(T)
K039	Filter cake from the filtration of diethylphosphorodithioic acid in the production of phorate	(T)
K040	Wastewater treatment sludge from the production of phorate.	(T)
K041	Wastewater treatment sludge from the production of toxaphene.	(T)
K098	Untreated process wastewater from the production of toxaphene.	(T)
K042	Heavy ends or distillation residues from the distillation of tetrachlorobenzene in the production of 2,4,5-T.	(T)
K043	2,6-Dichlorophenol waste from the production of 2,4-D.	(T)
K099	Untreated wastewater from the production of 2,4-D.	(T)
K123	Process wastewater (including supernates, filtrates, and washwaters) from the production of ethylenedisithiocarbamic acid and its salt.	(T)
K124	Reactor vent scrubber water from the production of ethylenedisithiocarbamic acid and its salts.	(C,T)
K125	Filtration, evaporation, and centrifugation solids from the production of ethylenedisithiocarbamic (acid and its salts).	(T)
K128	Baghouse dust and floor sweepings in milling and packaging operations from the production or formulation of ethylenedisithiocarbamic acid and its salts.	(T)
K131	Wastewater from the reactor and spent sulfuric acid from the acid dryer from the production of methyl bromide.	(C,T)
K132	Spent absorbent and wastewater separator solids from the production of methyl bromide.	(T)
Explosives:		
K044	Wastewater treatment sludges from the manufacturing and processing of explosives.	(R)
K045	Spent carbon from the treatment of wastewater containing explosives.	(R)
K046	Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.	(T)
K047	Pink/red water from TNT operations.	(R)
Petroleum refining:		
K048	Dissolved air flotation (DAF) float from the petroleum refining industry.	(T)
K049	Slop oil emulsion solids from the petroleum refining industry.	(T)
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry.	(T)
K051	API separator sludge from the petroleum refining industry.	(T)
K052	Tank bottoms (lead) from the petroleum refining industry.	(T)
Iron and steel:		
K061	Emission control dust/sludge from the primary production of steel in electric furnaces.	(T)
K062	Spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332).	(C,T)
Primary copper:		
K064	Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production.	(T)
Primary lead:		
K065	Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities.	(T)
Primary zinc:		
K066	Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production.	(T)
Primary aluminum:		
K088	Spent potliners from primary aluminum reduction.	(T)
Ferroalloys:		
K090	Emission control dust or sludge from ferrochromium-silicon production.	(T)
K091	Emission control dust or sludge from ferrochromium production.	(T)
Secondary lead:		
K069	Emission control dust/sludge from secondary lead smelting.	(T)
K100	Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.	(T)
Veterinary Pharmaceuticals:		
K084	Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	(T)
K101	Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	(T)
K102	Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	(T)
Ink formulation: K086	Solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning tube and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.	(T)
Coking:		
K060	Ammonia still lime sludge from coking operations.	(T)
K087	Decanter tank tar sludge from coking operations.	(T)

§ 261.33 Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof.

Following materials or items are hazardous wastes if and when they are discarded or intended to be discarded as described in §261.2(a)(2)(i), when they are mixed with waste oil or used oil or other material and applied to the land for dust suppression or road treatment, when they are otherwise applied to the land in lieu of their original intended use or when they are contained in products that are applied to the land in lieu of their original intended use, or when, in lieu of their original intended use, they are produced for use as (or as a component of) a fuel, distributed for use as a fuel, or burned as a fuel.

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraph (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph (e) or (f) of this section.

(c) Any residue remaining in a container or in an inner liner removed from a container that has held any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this section, unless the container is empty as defined in §261.7(b) of this chapter.

(d) Any residue or contaminated soil, water or other debris resulting from the cleanup of a spill into or on any land or water of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) or (f) of this section, or any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any off-

specification chemical product and manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph (e) or (f) of this section.

(e) The commercial chemical products, manufacturing chemical intermediates or off-specification commercial chemical products or manufacturing chemical intermediates referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to the small quantity exclusion defined in §261.5(e).

These wastes and their corresponding EPA Hazardous Waste Numbers are:

Hazardous waste No.	Chemical abstracts No.	Substance
P023	107-20-0	Acetaldehyde, chloro-
P002	591-08-2	Acetamide, N-(aminothiooxo-methyl)-
P057	640-19-7	Acetamide, 2-fluoro-
P058	62-74-8	Acetic acid, fluorosodium salt
P002	591-08-2	Acetyl-2-thiourea
P003	107-02-8	Acrolein
P070	116-06-3	Aldicarb
P004	309-00-2	Aldrin
P005	107-18-6	Allyl alcohol
P006	20859-73-8	Aluminum phosphide (R,T)
P007	2763-96-4	5-(Aminomethyl)-3-isoxazolol
P008	504-24-5	Aminopyridine
P009	31-74-8	Ammonium picrate (R)
P119	7803-56-6	Ammonium vanadate
P099	506-61-6	Argentate(1-), bis(cyano-C) potassium
P010	7778-39-4	Arsenic acid H_3AsO_4
P012	1327-53-3	Arsenic oxide As_2O_3
P011	1303-28-2	Arsenic oxide As_2O_5
P011	1303-28-2	Arsenic pentoxide
P012	1327-53-3	Arsenic trioxide
P038	692-42-2	Arsine, diethyl-
P036	696-28-6	Arsonous dichloride, phenyl-
P054	151-56-4	Aziridine
P067	75-55-8	Aziridine, 2-methyl-
P013	542-62-1	Barium cyanide
P024	106-47-8	Benzenamine, 4-chloro-
P077	100-01-6	Benzenamine, 4-nitro-
P028	100-44-7	Benzene, (chloromethyl)-
P042	51-43-4	1,2-Benzenediol, 4-[1-hydroxy-2(methylamino)ethyl]-, (R)-
P046	122-09-8	Benzeneethanamine, alpha, alpha-dimethyl-
P014	106-98-5	Benzenethiol
P001	¹ 81-81-2	2H-1-Benzopyran-2 one, 4-hydroxy-3-(3 oxo-1-phenylbutyl), & salts, when present at concentrations greater than 0.3%
P028	100-44-7	Benzyl chloride
P015	7440-41-7	Beryllium
P017	598-31-2	Bromoacetone
P018	357-57-3	Brucine
P045	39196-18-4	2-Butanone, 3,3-dimethyl-1-(methylthio)-, O-[methylamino] carbonyl] oxime
P021	592-01-8	Calcium cyanide
P021	592-01-8	Calcium cyanide $Ca(CN)_2$
P022	75-15-0	Carbon disulfide
P095	75-44-5	Carbonic dichloride
P023	107-20-0	Chloroacetaldehyde
P024	106-47-8	p-Chloroaniline
P026	5344-82-1	1-(o-Chlorophenyl)thiourea
P027	542-76-7	3-Chloropropionitrile
P029	544-92-3	Copper cyanide
P029	544-92-3	Copper cyanide $Cu(CN)$
P030	-----	Cyanides (soluble cyanide salts), not otherwise specified
P031	460-19-5	Cyanogen
P033	506-77-4	Cyanogen chloride
P033	506-77-4	Cyanogen chloride CN_2Cl
P034	131-89-5	2-Cyclohexyl-4,6-dinitrophenol
P016	542-88-1	Dichloromethyl ether
P036	696-28-6	Dichlorophenylarsine
P037	60-57-1	Dieldrin
P038	692-42-2	Diethylarsine
P041	311-45-5	Diethyl-p-nitrophenyl phosphate
P040	297-97-2	O,O-Diethyl O-pyrazinyl phosphorothioates
P043	55-91-4	Diisopropylfluorophosphate (DFP)
P004	309-00-2	1,4,5,8-Dimethanonaphthalene, 1,2,3,4-, 10,10-hexachloro-1,4,4a,5,8,8a-, hexa-hydro (1alpha,4alpha,4beta,5alpha,8alpha,8beta)-
P060	465-73-6	1,4,5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a-, hexa-hydro-, (1alpha,4alpha,4beta,5beta,8beta,8beta)-
P037	60-57-1	2,7,3,6-Dimethanonaphth[2,3-b]oxirene, 3,4,5,6,9,9-hexachloro-1a,2,2a,3,6,6a-, 7,7a-octahydro-, (1aalpha,2beta,2aalpha,3beta,6beta,6aalpha,7beta,7aalpha)-
P051	¹ 72-20-8	2,7,3,6-Dimethanonaphth[2,3-b]oxirene, 3,4,5,6,9,9-hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro(1aalpha,2beta,2beta,3alpha,6alpha,6beta,7beta,7aalpha)- & metabolites

Hazardous waste No.	Chemical abstracts No.	Substance
P044	60-51-5	Dimethoate
P046	122-09-8	alpha, alpha- Dimethylphenethylamine
P047	¹ 534-52-1	4,6-Dinitro-o-cresol, & salts
P048	51-28-5	2,4-Dinitrophenol
P020	88-85-7	Dinoseb
P085	152-16-9	Diphosphoramidate, octamethyl-
P111	107-49-3	Diphosphoric acid, tetraethyl ester
P039	298-04-4	Disulfoton
P049	541-53-7	Dithiobiuret
P050	115-29-7	Endosulfan
P088	145-73-3	Endothall
P051	72-20-8	Endrin
P051	72-20-8	Endrin, & metabolites
P042	51-43-4	Epinephrine
P031	460-19-5	Ethanedinitrile
P066	16752-77-5	Ethanimidothioic acid, N-[[[(methylamino) carbonyl]oxy]-, methyl ester
P101	107-12-0	Ethyl cyanide
P054	151-56-4	Ethyleneimine
P097	52-85-7	Famphur
P056	7782-41-4	Fluorine
P057	640-19-7	Fluoroacetamide
P058	62-74-8	Fluoroacetic acid, sodium salt
P065	628-86-4	Fulminic acid, mercury(2+) salt (R,T)
P059	76-44-8	Heptachlor
P062	757-58-4	Hexaethyl tetraphosphate
P116	79-19-6	Hydrazinecarbothioamide
P068	60-34-4	Hydrazine, methyl-
P063	74-90-8	Hydrocyanic acid
P063	74-80-8	Hydrogen cyanide
P086	7803-61-2	Hydrogen phosphide
P080	465-73-6	Isodrin
P007	2763-96-4	3(2H)-Isoxazolone, 5-(aminomethyl)-
P092	62-38-4	Mercury, (acetato-O)phenyl-
P065	628-86-4	Mercury fulminate (R,T)
P082	62-75-9	Methanamine, N-methyl-N-nitroso-
P064	624-83-9	Methane, isocyanato-
P016	542-88-1	Methane, oxybis(chloro-
P112	509-14-8	Methane, tetranitro- (R)
P118	75-70-7	Methanethiol, trichloro-
P050	115-29-7	6,9-Methano-2,4,3-benzodioxathiepin, 6,7,8,9,10,10-hexachloro-1,5,5a,6,9,9a-hexa-hydro-, 3-oxide
P059	76-44-8	4,7-Methano-1H-indene, 1,4,5,6,7,8,8-heptachloro-3a,4,7,7a-tetrahydro-
P066	16752-77-5	Methomyl
P068	60-34-4	Methyl hydrazine
P064	624-83-9	Methyl isocyanate
P069	75-86-5	2-Methylactonitrile
P071	298-00-0	Methyl parathion
P072	86-88-4	alpha-Naphthylthiourea
P073	13463-39-3	Nickel carbonyl
P073	13463-39-3	Nickel carbonyl $Ni(CO)_4$, (T-4)-
P074	557-19-7	Nickel cyanide
P074	557-19-7	Nickel cyanide $Ni(CN)_2$
P075	¹ 54-11-5	Nicotine, & salts
P076	10102-43-9	Nitric oxide
P077	100-01-6	p-Nitroaniline
P078	10102-44-0	Nitrogen dioxide
P076	10102-43-9	Nitrogen oxide NO
P078	10102-44-0	Nitrogen oxide NO2
P081	55-63-0	Nitroglycerine (R)
P082	62-75-9	N-Nitrosodimethyl-amine
P084	4549-40-0	N-Nitrosomethylvinylamine
P085	152-16-9	Octamethylpyrophosphoramidate
P087	20816-12-0	Osmium oxide OsO_4 , (T-4)-
P087	20816-12-0	Osmium tetroxide
P088	145-73-3	7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
P089	56-38-2	Parathion
P034	131-89-5	Phenol, 2-cyclohexyl-4,6-dinitro-
P048	51-28-5	Phenol, 2,4-dinitro-
P047	¹ 534-52-1	Phenol, 2-methyl-4,6-dinitro-, & salts
P020	88-85-7	Phenol, 2-(1-methylpropyl)-4,6-dinitro-
P009	131-74-8	Phenol, 2,4,6-trinitro-, ammonium salt (R)
P092	62-38-4	Phenylmercury acetate
P093	103-85-5	Phenylthiourea
P094	298-02-2	Phorate
P095	75-44-5	Phosgene
P096	7803-51-2	Phosphine
P041	311-45-5	Phosphoric acid, diethyl 4-nitrophenyl ester

Haz- ardous waste No.	Chemical abstracts No.	Substance
P039	298-04-4	Phosphorodithioic acid, O,O-diethyl S-[2-(ethylthio)ethyl] ester
P094	298-02-2	Phosphorodithioic acid, O,O-diethyl S-[(ethylthio)methyl] ester
P044	60-51-5	Phosphorodithioic acid, O,O-dimethyl S-[2-(methylamino)-2-oxoethyl] ester
P043	55-91-4	Phosphorofluoridic acid, bis(1-methylethyl ester
P089	56-38-2	Phosphorothioic acid, O,O-diethyl O-(4-nitrophenyl) ester
P040	297-97-2	Phosphorothioic acid, O,O-diethyl O-pyrazinyl ester
P097	52-85-7	Phosphorothioic acid, O-[4 [(dimethylamino)sulfonyl]phenyl] O,O-dimethyl ester
P071	298-00-0	Phosphorothioic acid, O,O-dimethyl O-(4-nitrophenyl) ester
P110	78-00-2	Plumbane, tetraethyl-
P098	151-50-8	Potassium cyanide
P098	151-50-8	Potassium cyanide K(CN)
P099	506-61-6	Potassium silver cyanide
P070	116-06-3	Propanal, 2-methyl-2-(methylthio)-, O-[(methylamino)-carbonyl]oxime
P101	107-12-0	Propanenitrile
P027	542-76-7	Propanenitrile, 3-chloro-
P069	75-86-5	Propanenitrile, 2-hydroxy-2-methyl-
P081	55-63-0	1,2,3-Propanetriol, trinitrate (R)
P017	598-31-2	2-Propanone, 1-bromo-
P102	107-19-7	Propargyl alcohol
P003	107-02-8	2-Propenal
P005	107-18-6	2-Propen-1-ol
P067	75-55-8	1,2-Propylenimine
P102	107-19-7	2-Propyn-1-ol
P008	504-24-5	4-Pyridinamine
P075	¹ 54-11-5	Pyridine, 3-(1-methyl-2-pyrrolidinyl)-, (S), & salts
P114	12039-52-0	Selenious acid, dithallium(1+) salt
P103	630-10-4	Selenourea
P104	506-64-9	Silver cyanide
P104	506-64-9	Silver cyanide Ag(CN)
P105	26628-22-8	Sodium azide
P106	143-33-9	Sodium cyanide
P106	143-33-9	Sodium cyanide Na(CN)
P108	1 57-24-9	Strychnidin-10-one, & salts
P018	357-57-3	Strychnidin-10-one, 2,3-dimethoxy-
P108	¹ 57-24-9	Strychnine, & salts
P115	7446-18-6	Sulfuric acid, dithallium(1+) salt
P109	3689-24-5	Tetraethyldithiopyrophosphate
P110	78-00-2	Tetraethyl lead
P111	107-49-3	Tetraethyl pyrophosphate
P112	509-14-8	Tetranitromethane (R)
P062	757-58-4	Tetraphosphoric acid, hexaethyl ester
P113	1314-32-5	Thallic oxide
P113	1314-32-5	Thallium oxide Tl_2O_3
P114	12039-52-0	Thallium(I) selenite
P115	7446-18-6	Thallium(I) sulfate
P109	3689-24-5	Thiodiphosphoric acid, tetraethyl ester
P045	39196-18-4	Thiofanox
P049	541-53-7	Thioimidodicarbonic diamide $[(H_2N)C(S)]_2NH$
P014	108-98-5	Thiophenol
P116	79-19-6	Thiosemicarbazide
P026	5344-82-1	Thiourea, (2-chlorophenyl)-
P072	86-88-4	Thiourea, 1-naphthalenyl-
P093	103-85-5	Thiourea, phenyl-
P123	8001-35-2	Toxaphene
P118	75-70-7	Trichloromethanethiol
P119	7803-55-6	Vanadic acid, ammonium salt
P120	1314-62-1	Vanadium oxide V_2O_5
P120	1314-62-1	Vanadium pentoxide
P084	4549-40-0	Vinylamine, N-methyl-N-nitroso-
P001	¹ 81-81-2	Warfarin, & salts, when present at concentrations greater than 0.3 %
P121	557-21-1	Zinc cyanide
P121	557-21-1	Zinc cyanide $Zn(CN)_2$
P122	1314-84-7	Zinc phosphide Zn_3P_2 , when present at concentrations greater than 10 % (R.T)

¹ CAS Number given for parent compound only.

(f) The commercial chemical products, manufacturing chemical intermediates, or off-specification commercial chemical (a) through (d) of this section, are identified as toxic wastes (T), unless otherwise designated and are subject to the small quantity generator exclusion defined in §261.5(a) and (g).

Hazardous waste No.	Chemical abstracts No.	Substance
U001	76-07-0	Acetaldehyde (I)
U034	75-87-6	Acetaldehyde, trichloro-
U187	62-44-2	Acetamide, N-(4-ethoxyphenyl)-
U005	53-96-3	Acetamide, N-9H-fluoren-2-yl-
U240	1 94-75-7	Acetic acid, (2,4-dichlorophenoxy)-, salts & esters
U112	141-78-6	Acetic acid ethyl ester (I)
U144	301-04-2	Acetic acid, lead(2+) salt
U214	563-68-8	Acetic acid, thallium(1+) salt
see F027	93-76-5	Acetic acid, (2,4,5-trichlorophenoxy)-
U002	67-64-1	Acetone (I)
U003	75-05-8	Acetonitrile (I,T)
U004	98-86-2	Acetophenone
U005	63-96-3	2-Acetylaminofluorene
U006	75-36-5	Acetyl chloride (C,R,T)
U007	79-06-1	Acrylamide
U008	79-10-7	Acrylic acid (I)
U009	107-13-1	Acrylonitrile
U011	61-82-5	Amitrole
U012	62-53-3	Aniline (I,T)
U136	75-60-5	Arsinic acid, dimethyl-
U014	492-80-8	Auramine
U015	115-02-6	Azaserine
U010	50-07-7	Azirino[2,3:3,4]pyrrolo[1,2-a]indole-4,7- dione, 6-amino-8- [(aminocarbonyl)oxy] methyl]-1,1a,2,8,8a,8b-hexahydro-8a-methoxy-5-methyl-, [1aS-(1aalpha,8beta, 8aalpha,8balpha)]-
U157	56-49-5	Benz[j]aceanthrylene, 1,2-dihydro-3-methyl-
U016	225-51-4	Benz[c]acridine
U017	8-87-3	Benzal chloride
U192	23950-58-5	Benzamide, 3,5-dichloro-N-(1,1-dimethyl-2-propynyl)-
U018	56-65-3	Benz[a]anthracene
U094	57-97-6	Benz[a]anthracene, 7,12-dimethyl-
U012	62-53-3	Benzenamine (I,T)
U014	492-80-8	Benzenamine, 4,4'-carbonimidoylbis[N,N-dimethyl-
U049	3165-93-3	Benzenamine, 4-chloro-2-methyl-,hydrochloride
U093	60-11-7	Benzenamine, N,N-dimethyl-4-(phenylazo)-
U328	95-53-4	Benzenamine, 2-methyl-
U353	106-49-0	Benzenamine, 4-methyl-
U158	101-14-4	Benzenamine,4,4'-methylenebis[2-chloro-

Hazardous waste No.	Chemical abstracts No.	Substance
U222	636-21-5	Benzenamine, 2-methyl-, hydrochloride
U181	99-55-8	Benzenamine, 2-methyl-5-nitro-
U019	71-43-2	Benzene (I,T)
U038	510-15-6	Benzenecetic acid, 4-chloro- alpha-(4-chlorophenyl)-alpha-hydroxy-, ethyl ester
U030	101-55-3	Benzene, 1-bromo-4-phenoxy-
U035	305-03-3	Benzenebutanoic acid, 4-[bis(2-chloroethyl)amino]-
U037	108-90-7	Benzene, chloro-
U221	25376-45-8	Benzenediamine, ar-methyl-
U028	117-81-7	1,2-Benzenedicarboxylic acid, bis(2-ethylhexyl) ester
U069	84-74-2	1,2-Benzenedicarboxylic acid, dibutyl ester
U088	84-66-2	1,2-Benzenedicarboxylic acid, diethyl ester
U102	131-11-3	1,2-Benzenedicarboxylic acid, dimethyl ester
U107	117-84-0	1,2-Benzenedicarboxylic acid, dioctyl ester
U070	95-50-1	Benzene, 1,2-dichloro-
U071	541-73-1	Benzene, 1,3-dichloro-
U072	106-46-7	Benzene, 1,4-dichloro-
U080	72-54-8	Benzene, 1,1'-(2,2-dichloroethylenedioxy)bis[4-chloro-
U017	98-87-3	Benzene, (dichloromethyl)-
U223	26471-62-5	Benzene, 1,3diisocyanatomethyl-(R,T)
U239	1330-20-7	Benzene, dimethyl- (I,T)
U201	108-46-3	1,3-Benzenediol
U127	118-74-1	Benzene, hexachloro-
U056	110-82-7	Benzene, hexahydro- (I)
U220	108-88-3	Benzene, methyl-
U105	121-14-2	Benzene, 1-methyl-2,4-dinitro-
U108	606-20-2	Benzene, 2-methyl-1,3-dinitro-
U055	98-82-8	Benzene, (1-methylethyl)- (I)
U169	98-95-3	Benzene, nitro-
U183	608-93-5	Benzene, pentachloro-
U185	82-68-8	Benzene, pentachloronitro-
U020	98-09-9	Benzenesulfonic acid chloride (C,R)
U020	98-09-9	Benzenesulfonyl chloride (C,R)
U207	95-94-3	Benzene, 1,2,4,5-tetrachloro-
U081	50-29-3	Benzene, 1,1'-(2,2,2-trichloroethylidene) bis[4-chloro-
U247	72-43-5	Benzene, 1,1'-(2,2,2-trichloroethylidene) bis[4-methoxy-
U023	98-07-7	Benzene, (trichloromethyl)-
U234	99-35-4	Benzene, 1,3,5-trinitro-

Haz- ardous waste No.	Chemical abstracts No.	Substance
U021	92-87-5	Benzidine
	1 81-07-2	1,2-Benzisothiazol-3(2H)-one, 1,1-dioxide, & salts
	94-59-7	1,3-Benzodioxole, 5-(2-ropenyl)-
41	120-58-1	1,3-Benzodioxole, 5-(1propenyl)-
U090	94-58-6	1,3-Benzodioxole, 5-propyl-
U054	189-55-9	Benzo[rs]pentaphene
U248	1 81-81-2	2H-1-Benzopyran-2-one, 4-hydroxy-3-(3-oxo-1-phenylbutyl)-, & salts, when present at concentrations of 0.3 % or less
U022	50-32-8	Benzo[a]pyrene
U197	106-51-4	p-Benzoquinone
U023	98-07-7	Benzotrichloride (C,R,T)
U085	1464-53-5	2,2'-Bioxirane
U021	92-87-5	1,1'-Biphenyl]-4,4'-diamine
U073	91-94-1	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dichloro-
U091	119-90-4	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethoxy-
U095	119-93-7	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethyl-
U225	75-25-2	Bromoform
U030	101-55-3	4-Bromophenyl phenyl ether
U128	87-68-3	1,3-Butadiene, 1,1,2,3,4,4-hexachloro-
U172	924-16-3	1-Butanamine, N-butyl-N-nitroso-
U031	71-35-3	1-Butanol (I)
U159	78-93-3	2-Butanone (I,T)
U160	1338-23-4	2-Butanone, peroxide (R,T)
U053	4170-30-3	2-Butenal
U074	764-41-0	2-Butene, 1,4-dichloro- (I,T)
U143	303-34-4	2-Butenoic acid, 2-methyl-, 7-[[2,3-dihydroxy-2-(1-methoxyethyl)-3-methyl-1-oxobutoxy]methyl]-2,3,5,7a-tetrahydro-1-H-pyrrolizin-1-yl ester, [1S-[1alpha(Z),7(2S*,3R*),7aalpha]]-
U031	71-36-3	n-Butyl alcohol (I)
U136	75-50-5	Cacodylic acid
U032	13765-19-0	Calcium chromate
U238	51-79-6	Carbamic acid, ethyl ester
U178	615-53-2	Carbamic acid, methylnitroso-, ethyl ester
U097	79-44-7	Carbamic chloride, dimethyl-
U114	1 111-54-6	Carbamodithioic acid, 1,2-ethanediybis-, salts & esters
U062	2303-16-4	Carbamothioic acid, bis(1-methylethyl)-, 2,3-dichloro-2-propenyl ester
U	6533-73-9	Carbonic acid, dithallium(1+) salt
U	353-50-4	Carbonic difluoride
U	79-22-1	Carbonochloridic acid, methyl ester (I,T)
U033	353-50-4	Carbon oxyfluoride (R,T)
U211	56-23-5	Carbon tetrachloride
U034	75-87-6	Chloral
U035	305-03-3	Chlorambucil
U036	57-74-9	Chlordane, alpha & gamma isomers
U026	494-03-1	Chlornaphazin
U037	108-90-7	Chlorobenzene
U038	510-15-6	Chlorobenzilate
U039	59-50-7	p-Chloro-m-cresol
U042	110-75-8	2-Chloroethyl vinyl ether
U044	67-66-3	Chloroform
U046	107-30-2	Chloromethyl methyl ether
U047	91-58-7	beta-Chloranaphthalene
U048	95-57-8	O-Chlorophenol
U049	3165-93-3	4-Chloro-o-toluidine, hydrochloride
U032	13765-19-0	Chromic acid H ₂ CrO ₄ , calcium salt
U050	216-01-9	Chrysene
U051	-----	Creosote
U052	1319-77-3	Cresol (Cresylic acid)
U053	4170-30-3	Crotonaldehyde
U055	98-82-8	Cumene (I)
U246	506-68-3	Cyanagen bromide (CN)Br
U197	106-51-4	2,5-Cyclohexadiene-1,4-dione
U056	110-62-7	Cyclohexane (I)
U129	58-89-9	Cyclohexane, 1,2,3,4,5,5-hexachloro-, (1alpha-, 2alpha,3beta,4alpha,5alpha,6beta)-
U057	108-94-1	Cyclohexanone (I)
U130	77-47-4	1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-
U058	50-18-0	Cyclophosphamide
U240	1 94-75-7	2,4-D, salts & esters
U059	20830-81-3	Daunomycin
U060	72-54-8	DDD
U061	50-29-3	DDT
U062	2303-16-4	Diallate
U063	53-70-3	Dibenz[a,h]anthracene
U06	39-55-9	Dibenzo[a,i]pyrene

Haz- ardous waste No.	Chemical abstracts Na.	Substance
U065	96-12-8	1,2-Dibromo-3-chloropropane
U059	84-74-2	Dibutyl phthalate
U070	95-50-1	-Dichlorobenzene
U071	541-73-1	m-Dichlorobenzene
U072	106-45-7	p-Dichlorobenzene
U073	91-94-1	3,3'-Dichlorobenzidine
U074	764-41-0	1,4-Dichloro-2-butene (I,T)
U075	75-71-8	Dichlorodifluoromethane
U078	75-35-4	1,1-Dichloroethylene
U079	155-60-5	1,2-Dichloroethylene
U025	111-44-4	Dichloroethyl ether
U027	108-50-1	Dichloroisopropyl ether
U024	111-91-1	Dichloromethoxy ethane
U081	120-83-2	2,4-Dichlorophenol
U082	87-56-0	2,5-Dichlorophenol
U084	542-75-6	1,3-Dichloropropene
U085	1464-53-5	1,2,3,4-Diepoxybutane (I,T)
U108	123-91-1	1,4-Diethyleneoxide
U028	117-81-7	Diethylhexyl phthalate
U085	1515-80-1	N,N'-Diethylhydrazine
U087	3288-58-2	O,O-Diethyl S-methyldithiophosphate
U088	84-66-2	Diethyl phthalate
U089	56-53-1	Diethylstilbesterol
U090	94-58-5	Dihydrosafrole
U091	119-90-4	3,3'-Dimethoxybenzidine
U092	124-40-3	Dimethylamine (I)
U093	60-11-7	p-Dimethylaminoazobenzene
U094	57-97-6	7,12-Dimethylbenz- [a]anthracene
U095	119-93-7	3,3'-Dimethylbenzidine
U096	60-15-9	alpha, alpha-Dimethylbenzylhydroperoxide (R)
U097	79-44-7	Dimethylcarbamoyl chloride
U098	57-14-7	1,1-Dimethylhydrazine
U099	540-73-8	1,2-Dimethylhydrazine
U101	105-67-9	2,4-Dimethylphenol
U102	131-11-3	Dimethyl phthalate
U103	77-78-1	Dimethyl sulfate
U105	121-14-2	2,4-Dinitrotoluene
U106	606-20-2	2,5-Dinitrotoluene
U107	117-84-0	Di-n-octyl phthalate
U108	123-91-1	1,4-Dioxane
U109	122-56-7	1,2-Diphenylhydrazine
U110	142-84-7	Dipropylamine (I)
U111	621-64-7	Di-n-propylnitrosamine
U041	106-89-6	Epichlorohydrin
U001	75-07-0	Ethanal (I)
U174	55-18-5	Ethanamine, N-ethyl-N-nitroso-
U155	91-80-5	1,2-Ethanediamine, N,N-dimethyl-N-2pyridinyl-N-(2-thienylimethyl)-
U067	106-93-4	Ethane, 1,2-dibromo-
U076	75-34-3	Ethane, 1,1-dichloro-
U077	107-06-2	Ethane, 1,2-dichloro-
U131	67-72-1	Ethane, hexachloro-
U024	111-91-1	Ethane, 1,1'-(methylenebis(oxy) bis(2-chloro-
U117	60-29-7	Ethane, 1,1'-oxybis-(I)
U025	111-44-5	Ethane, 1,1'-oxybis(2-chloro-
U184	76-01-7	Ethane, pentachloro-
U208	530-20-6	Ethane, 1,1,1,2-tetrachloro-
U209	79-34-6	Ethane, 1,1,2,2-tetrachloro-
U218	52-55-5	Ethanethioamide
U225	71-55-5	Ethane, 1,1,1-trichloro-
U227	79-00-5	Ethane, 1,1,2-trichloro-
U359	110-80-5	Ethanol, e-ethoxy-
U173	1116-54-7	Ethanol, 2,2'-(nitrosoimino)bis-
U004	98-86-2	Ethanone, 1-phenyl-
U043	75-01-4	Ethene, chloro-
U042	110-75-8	Ethene, (2-chloroethoxy)-
U078	75-35-4	Ehtene, 1,1-dichloro-
U079	155-50-5	Ehtene, 1,2-dichloro-, (E)-
U210	127-18-4	Ehtene, tetrachloro-
U228	79-01-6	Ehtene, trichloro-
U112	141-76-6	Ethyl acetate (I)
U113	140-88-5	Ehtyl acrylate (I)
U238	51-79-6	Ethyl carbamate (urethane)
U117	60-29-7	Ethyl ether (I)
U114	111-54-6	Ethylenebisdithiocarbamic acid, salts & esters
U067	105-93-4	Ethylene dibromide
U077	107-06-2	Ethylene dichloride
U0359	110-80-5	Ethylene glycol monoethyl ether
U115	75-21-8	Ethylene oxide (I, T)

Haz- ardous waste No.	Chemical abstracts No.	Substance
U116	96-45-7	Ethylenethiourea
U076	75-34-3	Ethylidene dichloride
U118	97-63-2	Ethyl methacrylate
U119	62-50-0	Ethyl methanesulfonate
U120	206-44-0	Fluornathene
U122	50-00-0	Formaldehyde
U123	64-18-6	Formic acid (C, T)
U124	110-00-9	Furan (I)
U125	98-01-1	2-Furancarboxaldehyde (I)
U147	108-31-6	2,5-Furandione
U213	109-99-9	Furan, tetrahydro-(I)
U125	98-01-1	Furfural (I)
U124	110-00-9	Furfuran (I)
U206	18883-66-4	Flucopyranose, 2-deoxy-2(3-methyl-3-nitro- soureido)-,D-
U206	18883-66-4	D-Glucose, 2-deoxy-2((methylnitrosoamino)- caronyl)amino)-
U126	765-34-4	Glycidylaldehyde
U163	70-25-7	Duanidine, N-methyl-N'-nitro-N-nitroso-
U127	118-74-1	Hexachorobenzene
U128	87-68-3	Hexachorocyclopentadiene
U130	77-47-4	Hexachlorocyclopentadiene
U131	67-72-1	Hexachoroethane
U132	70-30-4	Hexachorophene
U243	1888-71-7	Hexachloropropene
U133	302-01-2	Hydrazine (R, T)
U086	1615-80-1	Hydrazine, 1,2-diethyl-
U098	57-14-7	Hydrazine, 1,1-dimethyl-
U099	540-73-8	Hydrazine, 1,2-dimethyl-
U109	122-66-7	Hydrazine, 1,2-diphenyl-
U134	7664-39-3	Hydrofluoric acid (D, T0)
U134	7664-39-3	Hydrogen fluoride (C, T)
U135	7783-06-4	Hydrogen sulfide
U135	7783-06-4	Hydrogen sulfide H ₂ S
U096	80-15-9	Hydroperoxide, 1-methyl-1-phenylethyl- (R)
U116	96-45-7	2-Imidazolidinethione
U137	193-39-5	Indeno(1,2,3-cd)pyrene
U190	85-44-9	1,3-isobenzofurandione
U140	78-83-1	Isobutyl alcohol (I,T)
U141	120-58-1	Isosafrole
U142	143-50-0	Kepone
U143	303-34-4	Lasiocarpine
U144	301-04-2	Lead acetate
U146	1335-32-6	Lead, bis(acetato-O)tetrahydroxytri-
U145	7446-27-7	Lead phosphate
U146	1335-32-6	Lead subacetate
U129	58-89-9	Lindane
U163	70-25-7	MNNG
U147	108-31-6	Maleic anhydride
U148	123-33-1	Maleic hydrazide
U149	109-77-3	Mapnonitrile
U150	148-82-3	Melphalan
U151	7439-97-6	Mercury
U152	126-98-7	Methacrylonitrile (I, T)
U092	124-40-3	Methanamine, N-methyl- (I)
U029	74-83-9	Methane, bromo-
U045	74-87-3	Methane, chloro- (I, T)
U046	107-30-2	Methane, chloromethoxy-
U068	74-95-3	Methane, dibromo-
U080	75-09-2	Methane, dichloro-
U075	75-71-8	Methane, dichlorodifluoro-

Haz- ardous waste No.	Chemical abstracts No.	Substance
U138	74-88-4	Methane, iodo-
U119	52-50-0	Methanesulfonic acid, ethyl ester
U211	25-23-5	Methane, tetrachloro-
U153	74-93-1	Methanethiol (I, T)
U225	75-25-2	Methane, tribromo-
U044	67-56-3	Methane, trichloro-
U121	75-59-4	Methane trichlorofluoro-
U036	57-74-9	4,7-Methano-1H-indene, 12,3,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-
U154	67-56-1	Methanol (I)
U155	91-80-5	Methapyrilene
U142	143-50-0	1,3,4-Metheno-2H-cyclobuta(cd)pentalen-2-one, 1,1a,3,3a,4,5,5a,5b,6-decachlorooctahydro-
U247	72-43-5	Methoxychlor
U154	67-55-1	Methyl alcohol (I)
U029	74-83-9	Methyl bromide
U186	504-60-9	1-Methylbutadiene (I)
U045	74-87-3	Methyl chloride (I, T)
U156	79-22-1	Methyl chlorocarbonate (I, T)
U226	71-55-6	Methyl chloroform
U157	56-49-5	3-Methylcholanthrene
U158	101-14-4	4,4'-Methylenebis(2-chloroaniline)
U068	74-95-3	Methylene bromide
U080	75-09-2	Methylene chloride
U159	78-93-3	Methyl ethyl ketone (MEK) (I, T)
U160	1338-23-4	Methyl iodide
U138	74-2884	Methyl isobutyl ketone (I)
U161	108-10-1	Methyl methacrylate (I, T)
U162	80-62-5	4-Methyl-2-pentanone (I)
U161	108-10-1	Methylthiouracil
U164	108-10-1	Mitomycin C
U010	50-07-7	5,12-Naphthacenedione, 8-acetyl-10-((3-amino-2,3,5-trideoxy)-alpha-L-lyxohydropyranosyl oxy)-7,8,9,10-tetrahydro-6,8,11,-trihydroxy-1-methoxy-, (8S-cis)-
U059	20830-81-3	1-Naphthalenamine
U157	134-32-7	2-Naphthalenamine
U158	91-59-8	Naphthalenamine, N,N-bis(2-chloroethyl)-
U026	494-03-1	Naphthalene
U155	91-20-3	Naphthalene
U047	91-58-7	Naphthalene, 2-chloro-
U156	130-15-4	1,4-Naphthalenedione
U236	72-57-1	2,7-Naphthalenedisulfonic acid, 3,3'-((3,3'-dimethyl(1,1'-biphenyl)-4,4'-diyl)bis(azo)bis(5-amino-4-hydroxy)-, tetrasodium salt
U156	130-15-4	1,4-Naphthoquinone
U157	134-32-7	alpha-Naphthylamine
U158	91-59-8	beta-Naphthylamine
U217	10102-45-1	Nitric acid, thallium(1+) salt
U169	98-95-3	Nitrobenzene (I, T)
U170	100-02-71	p-Nitrophenol
U171	79-46-9	2-Nitropropane (I, T)
U172	924-16-3	N-Nitrosodi-n-butylamine
U173	1116-54-7	N-Nitrosodiethanolamine
U174	55-18-5	N-Nitrosodiethylamine
U176	759-73-9	N-Nitroso-N-ethylurea
U177	584-93-5	N-Nitroso-N-methylurea
U178	615-53-2	N-Nitroso-N-methylurethane
U179	100-75-4	N-Nitrosopiperidine

Haz- ardous waste No.	Chemical abstracts No.	Substance
U180	930-55-2	N-Nitrosopyrrolidine
U181	99-55-8	5-Nitro-o-toluidine
U193	1120-71-4	1,2-Oxathiolane, 2,2-dioxide
U058	50-18-0	2H-1,3,2-Oxazaphosphorin-2-amine, N,N- bis(2-chloroethyl)tetrahydro-, 2-oxide
U115	75-21-8	Oxirane (I,T)
U126	765-34-4	Oxiranecarboxyaldehyde
U041	106-89-8	Oxirane, (chloromethyl)-
U182	123-63-7	Paraldehyde
U183	608-93-5	Pentachlorobenzene
U184	76-01-7	Pentachloronethane
U185	82-68-8	Pentachloronitrobenzene (PCNB)
See		
F027	87-86-5	Pentachlorophenol
U161	108-10-1	Pentanol, 4-methyl-
U186	504-60-9	1,3-Pentadiene (I)
U187	62-44-2	Phenacetin
U188	108-95-2	Phenol
U048	95-57-8	Phenol, 2-chloro-
U039	59-50-7	Phenol, 4-chloro-3-methyl-
U081	120-83-2	Phenol, 2,4-dichloro-
U082	87-65-0	Phenol, 2,6-dichloro-
U089	56-53-1	Phenol, 4,4'-(1,2-diethyl-1,2-ethenediyl)bis- (E)-
U101	105-67-9	Phenol, 2,4-dimethyl-
U052	1319-77-3	Phenol, methyl-
U132	70-30-4	Phenol, 2,2-methylenebis(3,4,6-trichloro-
U170	100-02-7	Phenol, 4-nitro-
See		
F027	87-86-5	Phenol, pentachloro-
See		
F027	58-90-2	Phenol, 2,3,4,6-tetrachloro-
See		
F027	95-95-4	Phenol, 2,4,5-trichloro-
See		
F027	88-08-2	Phenol, 2,4,6-trichloro-
U150	148-82-3	L-Phenylalanine, 4-(bis(2-chloroethyl)amino)-
U145	7446-27-7	Phosphoric acid, lead(2+) salt(2:3)
U087	3288-58-2	Phosphorodithioic acid, O,O-diethyl S-methyl ester
U180	1314-80-3	Phosphorus sulfide (R)
U190	85-44-9	Phthalic anhydride
U191	109-06-8	2-Picoline
U179	100-75-4	Piperidine, 1-nitroso-
U192	23950-58-5	Pronamide
U194	107-10-8	1-Propanamine (I, T)
U111	621-64-7	1-Propanamine, N-nitroso-N-propyl-
U110	142-64-7	1-Propanamine, N-propyl-(I)
U066	96-12-8	Propane, 1,2-dibromo-3-chloro-
U083	78-87-5	Propane, 1,2-dichloro-
U149	109-77-3	Propanedinitrile
U171	79-46-9	Propane, 2-nitro- (I,T)
U027	108-60-1	Propane, 2,2-oxybis(2-chloro-
U193	1120-71-4	1,3-Propane sultone
See		
F027	93-72-1	Propanoic acid, 2-(2,4,5- trichlorophenoxy)-
U235	126-72-7	1-Propanol, 2,3-dibromo-, phosphate (3:1)
U140	78-83-1	1-Propanol, 2-methyl- (O,T)
U002	67-64-1	2-Propanone (I)
U007	79-06-1	2-Propenamide
U084	542-75-6	1-Propene, 1,3-dichloro-
U243	1888-71-7	1-Propene, 1,1,2,3,3,3-hexachloro-
U009	107-13-1	2-Propenenitrile
U152	126-96-7	2-Propenenitrile, 2-methyl- (I,T)
U008	79-10-7	2-Propenoic acid (I)
U113	140-88-5	2-Propenoic acid, ethyl ester (I)

Hazardous waste No.	Chemical abstracts No.	Substance
U118	97-63-2	2-Propenoic acid, 2-methyl, ethyl ester
U162	80-62-6	2-Propenoic acid, 2-methyl, methyl ester (I,T)
U194	107-10-8	N-Propylamine (I,T)
U083	78-87-5	Propylene dichloride
U148	123-33-1	3,6-Pyridazinedione, 1,2-dihydro-
U196	110-86-1	Pyridine
U191	109-06-8	Pyridine, 2-methyl-
U237	66-75-1	2,4-(1H/H)-Pyrimidinedione, 5-[bis(2-chloroethyl)amino]-
U164	56-04-2	4(1H)-Pyrimidinone, 2,3-dihydro-6-methyl-2-thioxo-
U180	930-55-2	Pyrrolidine, 1-nitroso-
U200	50-55-5	Reserpine
U201	108-46-3	Resorcinol
U202	87-07-2	Saccharin, & salts
U203	94-59-7	Saffrole
U204	7783-00-8	Selenious acid
U204	7783-00-8	Selenium dioxide
U205	7488-56-4	Selenium sulfide
U205	7488-56-4	Selenium sulfide SeS ₂ (R,T)
U015	115-02-6	L-Serine, diazoacetate (ester)
See		
F027	93-72-1	Silvex (2,4,5-TP)
U206	18883-66-4	Streptozotocin
U103	77-78-1	Sulfuric acid, dimethyl ester
U189	1314-80-3	Sulfur phosphide (R)
See		
F027	93-76-5	2,4,5-T
U207	95-94-3	1,2,4,5-Tetrachlorobenzene
U208	630-20-6	1,1,1,2-Tetrachloroethane
U209	79-34-5	1,1,2,2-Tetrachloroethane
U210	127-18-4	Tetrachloroethylene
See		
F027	58-90-2	2,3,4,6-Tetrachlorophenol
U213	109-99-9	Tetrahydrofuran (I)
U214	563-68-8	Thallium(I) acetate
U215	6533-73-9	Thallium(I) carbonate
U216	7791-12-0	Thallium(I) chloride
U216	7791-12-0	Thallium chloride TlCl
U217	10102-45-1	Thallium(I) nitrate
U218	62-55-5	Thioacetamide
U153	74-93-1	Thiomethanol (I,T)
U244	137-26-8	Thioperoxydicarbonic dimide [(HH ₂ N)C(S)] ₂ S ₂ , tetramethyl-
U219	62-66-6	Thiourea
U244	137-26-8	Thiram
U220	106-88-3	Toluene
U221	25376-45-8	Toluenediamine
U223	26471-62-5	Toluene diisocyanate (R, T)
U328	95-53-4	o-Toluidine
U353	106-49-0	p-Toluidine
U222	636-21-5	o-Toluidine hydrochloride
U011	61-82-5	1H-1,2,4-Triazol-3-amine
U227	79-00-5	1,1,2-Trichloroethane
U228	79-01-6	Trichloroethylene
U121	75-69-4	Trichloromonofluoromethane
See		
F027	95-95-4	2,4,5-Trichlorophenol
See		
F027	88-06-2	2,4,6-Trichlorophenol
U234	99-35-4	1,3,5-Trinitrobenzene (R,T)
U182	123-63-7	1,3,5-Trioxane, 2,4,6-trimethyl-

Hazardous waste No.	Chemical abstracts No.	Substance
U235	126-72-7	Tris(2,3-dibromopropyl) phosphate
U236	72-57-1	Trypan blue
U237	66-75-1	Uracil mustard
U176	759-73-9	Urea, N-ethyl-N-nitroso-
U177	684-93-5	Urea, N-methyl-N-nitroso-
U043	75-01-4	Vinyl chloride
U248	¹ 81-81-2	Warfarin, & salts, when present at concentrations of 0.3% or less
U239	1330-20-7	Xylene (I)
U200	50-55-5	Yohimban-16-carboxylic acid, 11, 17-dimethoxy-18-((3,4,5-trimethoxybenzoyl)oxy), methyl ester, (3beta, 16beta, 17alpha, 18beta, 20alpha)-
U249	1314-84-7	Zinc phosphide Zn ₃ P ₂ when present concentrations of 10% or less

¹ CAS Number given for parent compound only.

the reporting and recordkeeping requirements contained in this section were approved by OMB under control number 2050-0047.)

(The reporting and recordkeeping requirements contained in this section were approved by OMB under control number 2050-0047.)

§ 261.35 Deletion of Certain Hazardous Waste Codes Following Equipment Cleaning and Replacement.

Wastes from wood preserving processes plants that do not resume or initiate use of chlorophenolic preservatives will not meet the listing definition of F032 once the generator has met all of the requirements of paragraphs (b) and (c) of this section. These wastes may, however, continue to meet another hazardous waste listing description or may exhibit one or more of the hazardous waste characteristics.

(b) Generators must either clean or replace all process equipment that may have come into contact with chlorophenolic formulations or constituents thereof, including, but not limited to, treatment cylinders, sumps, tanks, piping systems, drip pads, fork lifts, and trams, in a manner that minimizes or eliminates the escape of hazardous waste or constituents, leachate, contaminated drippage, or hazardous waste decomposition products to the groundwater, surface water, or atmosphere.

(1) Generators shall do one of the following:

(i) Prepare and follow an equipment cleaning plan and clean equipment in accordance with this section;

(ii) Prepare and follow an equipment replacement plan and replace equipment in accordance with this section; or

(iii) Document cleaning and replacement in accordance with this section, carried out after termination of use of chlorophenolic preservatives.

(2) Cleaning Requirements.

(i) Prepare and sign a written equipment cleaning plan that describes:

- (A) The equipment to be cleaned;
- (B) How the equipment will be cleaned;
- (C) The solvent to be used in cleaning;
- (D) How solvent rinses will be tested; and
- (E) How cleaning residues will be disposed.

(ii) Equipment must be cleaned as follows:

(A) Remove all visible residues from process equipment;

(B) Rinse process equipment with an appropriate solvent until dioxins and dibenzofurans are not detected in the final solvent rinse.

(iii) Analytical requirements.

(A) Rinses must be tested in accordance with SW-846, Method 8290.

(B) "Not detected" means at or below the lower method calibration limit (MCL) in Method 8290, Table 1.

(iv) The generator must manage all residues from the cleaning process as F032 waste.

(3) Replacement requirements.

(i) Prepare and sign a written equipment replacement plan that describes:

- (A) The equipment to be replaced;
- (B) How the equipment will be replaced; and
- (C) How the equipment will be disposed.

(ii) The generator must manage the discarded equipment as F032 waste.

(4) Documentation requirements.

(i) Document that previous equipment cleaning and/or replacement was performed in accordance with this section and occurred after cessation of use of chlorophenolic preservatives.

(c) The generator must maintain the following records documenting the cleaning and replacement as part of the facility's operating record:

- (1) The name and address of the facility;
- (2) Formulations previously used and the date on which their use ceased in each process at the plant;
- (3) Formulations currently used in each process at the plant;
- (4) The equipment cleaning or replacement plan;
- (5) The name and address of any persons who conducted the cleaning and replacement;
- (6) The dates on which cleaning and replacement were accomplished;
- (7) The dates of sampling and testing;
- (8) A description of the sample handling and preparation techniques, including techniques used for extraction, containerization, preservation, and chain-of-custody of the samples;
- (9) A description of the tests performed, the date the tests were performed, and the results of the tests;
- (10) The name and model numbers of the instrument(s) used in performing the tests;
- (11) QA/QC documentation; and
- (12) The following statement signed by the generator or his authorized representatives:

I certify under penalty of law that all process equipment required to be cleaned or replaced under 40 CFR 261.35 was cleaned or replaced as represented in the equipment cleaning and replacement plan and accompanying documentation. I am aware that there are significant penalties for providing false information, including the possibility of fine or imprisonment.

ATTACHMENT “F”

ENVIRONMENTAL PROTECTION AGENCY REGULATIONS FOR HAZARDOUS WASTE GENERATORS

40 CFR 262

PART 262 -- STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

Subpart A -- General

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262.10	Purpose, scope, and applicability.
262.11	Hazardous waste determination.
262.12	EPA identification numbers.

Subpart B -- The Manifest

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262.21	Acquisition of manifests.
262.22	Number of copies.
262.23	Use of the manifest.

Subpart C -- Pre-Transport Requirements

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262.31	Labeling.
262.32	Marking.
262.33	Placarding.
262.34	Accumulation time.

Subpart D -- Recordkeeping and Reporting

262.40	Recordkeeping.
262.41	Biennial report.
262.42	Exception reporting.
262.43	Additional reporting.
262.44	Special requirements for generators of between 100 and 1000 kg/mo.

Subpart E -- Exports of Hazardous Waste

262.50	Applicability.
262.51	Definitions.
262.52	General requirements.
262.53	Notification of intent to export.
262.54	Special manifest requirements.
262.55	Exception reports.
262.56	Annual reports.
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Subpart F -- Imports of Hazardous Waste

262.60	Imports of hazardous waste.
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Subpart G -- Farmers

262.70	Farmers.
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APPENDIX--UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS (EPA FORMS 8700-22 AND 8700-22A AND THEIR INSTRUCTIONS)

Subpart A -- General

§ 262.10 Purpose, scope, and applicability.

(a) These regulations establish standards for generators of hazardous waste.

(b) A generator who treats, stores, or disposes of hazardous waste on-site must only comply with the following sections of this part with respect to that waste: Section 262.11 for determining whether or not he has a hazardous waste, §262.12 for obtaining an EPA identification number, §262.34 for accumulation of hazardous waste, §262.40 (c) and (d) for recordkeeping, §262.43 for additional reporting, and if applicable, §262.70 for farmers.

(c) Any person who imports hazardous waste into the United States must comply with the standards applicable to generators established in this part.

(d) A farmer who generates waste pesticides which are hazardous waste and who complies with all of the requirements of §262.70 is not required to comply with other standards in this part or 40 CFR Parts 270, 264, 265, or 268 with respect to such pesticides.

(e) A person who generates a hazardous waste as defined by 40 CFR Part 261 is subject to the compliance requirements and penalties prescribed in section 3006 of the Act if he does not comply with the requirements of this part.

(f) An owner or operator who initiates a shipment of hazardous waste from a treatment, storage, or disposal facility must comply with the generator standards established in this part.

262.11 Hazardous waste determination.

A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

(a) He should first determine if the waste is excluded from regulation under 40 CFR 261.4.

(b) He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

(c) For purposes of compliance with 40 CFR part 268, or if the waste is not listed in subpart D of 40 CFR part 261, the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either:

(1) Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or

(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

(d) If the waste is determined to be hazardous, the generator must refer to Parts 264, 265, 268 of this chapter for possible exclusions or restrictions pertaining to management of his specific waste.

§ 262.12 EPA identification numbers.

(a) A generator must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without having received an EPA identification number from the Administrator.

(b) A generator who has not received an EPA identification number may obtain one by applying to the Administrator using EPA form 8700-12. Upon receiving the request the Administrator will assign an EPA identification number to the generator.

(c) A generator must not offer his hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number.

Subpart B -- The Manifest

§ 262.20 General requirements.

(a) A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a Manifest OMB control number 2050-0039 on EPA form 8700-22, and, if necessary, EPA form 8700-22A, according to the instructions included in the Appendix to Part 262.

(b) A generator must designate on the manifest one facility which is per-

mitted to handle the waste directed on the manifest.

(c) A generator may also designate an alternate facility which is permitted to handle his waste in the event an agency prevents delivery of the waste to the designated facility.

(d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator must either designate another facility or instruct the transporter to return the waste.

(e) The requirements of this subpart do not apply to hazardous waste produced by generators of greater than 100 kg but less than 1000 kg in a calendar month where:

(1) The waste is reclaimed under a contractual agreement pursuant to which:

(i) The type of waste and frequency of shipments are specified in the agreement;

(ii) The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and

(2) The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement.

§ 262.21 Acquisition of manifests.

(a) If the State to which the shipment is manifested (consignment State) supplies the manifest and requires its use, then the generator must use that manifest.

(b) If the consignment State does not supply the manifest, but the State in which the generator is located (generator State) supplies the manifest and requires its use, then the generator must use that State's manifest.

(c) If neither the generator State nor the consignment State supplies the manifest, then the generator may obtain the manifest from any source.

§ 262.22 Number of copies.

The manifest consists of at least the number of copies which will provide the generator, each transporter, and the owner or operator of the designated facility with one copy each for their records and another copy to be returned to the generator.

§ 262.23 Use of the manifest.

(a) The generator must:

(1) Sign the manifest certification by hand; and

(2) Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest; and

(3) Retain one copy, in accordance with § 262.40(a).

(b) The generator must give the transporter the remaining copies of the manifest.

(c) For shipments of hazardous waste within the United States solely by water (bulk shipments only), the generator must send three copies of the manifest dated and signed in accordance with this section to the owner or operator of the designated facility or the last water (bulk shipment) transporter to handle the waste in the United States if exported by water. Copies of the manifest are not required for each transporter.

(d) For rail shipments of hazardous waste within the United States which originate at the site of generation, the generator must send at least three copies of the manifest dated and signed in accordance with this section to:

(1) The next non-rail transporter, if any; or

(2) The designated facility if transported solely by rail; or

(3) The last rail transporter to handle the waste in the United States if exported by rail.

(a) For shipments of hazardous waste to a designated facility in an authorized State which has not yet obtained authorization to regulate that particular waste as hazardous, the generator must assure that the designated facility agrees to sign and return the manifest to the generator, and that any out-of-state transporter signs and forwards the manifest to the designated facility.

Subpart C -- Pre-Transport Requirements

§ 262.30 Packaging.

Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must package the waste in accordance with the applicable Department of Transportation regulations on packaging under 49 CFR Parts 173, 178, and 179.

§ 262.31 Labeling.

Before transporting or offering hazardous waste for transportation off-site, a generator must label each package in accordance with the appli-

cable Department of Transportation regulations on hazardous materials under 49 CFR Part 172.

§ 262.32 Marking.

(a) Before transporting or offering hazardous waste for transportation off-site, a generator must mark each package of hazardous waste in accordance with the applicable Department of Transportation regulations on hazardous materials under 49 CFR Part 172;

(b) Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must mark each container of 110 gallons or less used in such transportation with the following words and information displayed in accordance with the requirements of 49 CFR 172.304:

HAZARDOUS WASTE--Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address-----

Manifest Document Number-----

§ 262.33 Placarding.

Before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must placard or offer the initial transporter the appropriate placards according to Department of Transportation regulations for hazardous materials under 49 CFR Part 172, Subpart F.

§ 262.34 Accumulation time.

(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(1) The waste is placed:

(i) in containers and the generator complies with subpart I of 40 CFR part 265; and/or

(ii) in tanks and the generator complies with subpart J of 40 CFR Part 265, except §§ 265.197(c) and 265.200; and/or

(iii) On drip pads and the generator complies with subpart W of 40 CFR part 265 and maintains the following records at the facility;

(A) A description of procedures that will be followed to ensure that all wastes are removed from the drip pad and associated collection system at least once every 90 days; and

(B) Documentation of each waste removal, including the quantity of waste removed from the drip pad and the sump or collection system and the date and time of removal.

In addition, such a generator is exempt from all requirements in subparts G and H of 40 CFR part 265, except for §§265.111 and 265.114.

(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste"; and

(4) The generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265, with 265.16, and with 40 CFR 268.7(a)(4).

(b) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 270 unless he has been granted an extension to the 90-day period. Such extension may be granted by EPA if hazardous wastes must remain on-site for longer than 90 days due to unforeseen, temporary, and uncontrollable circumstances. An extension of up to 30 days may be granted at the discretion of the Regional Administrator on a case-by-case basis.

(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he:

(i) Complies with §§265.171, 265.172, and 265.173(a) of this chapter; and

(ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

(2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in §261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within

three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) through (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

(d) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:

(1) The quantity of waste accumulated on-site never exceeds 6000 kilograms;

(2) The generator complies with the requirements of Subpart I of Part 265, except §265.176;

(3) The generator complies with the requirements of §265.201 in Subpart J of Part 265;

(4) The generator complies with the requirements of paragraphs (a)(2) and (a)(3) of this section, the requirements of subpart C of Part 265, the requirements of 40 CFR 268.7(a)(4);

(5) The generator complies with the following requirements:

(i) At all times there must be at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (d)(5)(iv) of this section. This employee is the emergency coordinator.

(ii) The generator must post the following information next to the telephone:

(A) The name and telephone number of the emergency coordinator;

(B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and

(C) The telephone number of the fire department, unless the facility has a direct alarm.

(iii) The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies:

(iv) The emergency coordinator or his designee must respond to any emergencies that arise. The applicable responses are as follows:

(A) In the event of a fire, call the fire department or attempt to extinguish it using a fire extinguisher;

(B) In the event of a spill, contain the flow of hazardous waste to the extent possible, and as soon as is practicable, clean up the hazardous waste and any contaminated materials or soil;

(C) In the event of a fire, explosion, or other release which could threaten human health outside the facility or when the generator has knowledge that a spill has reached surface water, the generator must immediately notify the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include the following information:

(1) The name, address, and U.S. EPA Identification Number of the generator;

(2) Date, time, and type of incident (e.g., spill or fire);

(3) Quantity and type of hazardous waste involved in the incident;

(4) Extent of injuries, if any; and

(5) Estimated quantity and disposition of recovered materials, if any.

(e) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and who must transport his waste, or offer his waste for transportation, over a distance of 200 miles or more for off-site treatment, storage or disposal may accumulate hazardous waste on-site for 270 days or less without a permit or without having interim status provided that he complies with the requirements of paragraph (d) of this section.

(f) A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month and who accumulates hazardous waste in quantities exceeding 6000 kg or accumulates hazardous waste for more than 180 days (or for more than 270 days if he must transport his waste, or offer his waste for transportation, over a distance of 200 miles or more) is

an operator of a storage facility and is subject to the requirements of 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 270 unless he has been granted an extension to the 180-day (or 270-day if applicable) period.

extension may be granted by EPA if hazardous wastes must remain on-site for longer than 180 days (or 270 days if applicable) due to unforeseen, temporary, and uncontrollable circumstances. An extension of up to 30 days may be granted at the discretion of the Regional Administrator on a case-by-case basis.

Subpart D -- Recordkeeping and Reporting

§ 262.40 Recordkeeping.

(a) A generator must keep a copy of each manifest signed in accordance with §262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

(b) A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.

(c) A generator must keep records of any test results, waste analyses, or other determinations made in accordance with §262.11 for at least three years from the date that the waste was transported to on-site or off-site treatment, storage, or disposal.

(d) The periods or retention referred to in this section are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

§ 262.41 Biennial Report.

(a) A generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Regional Administrator by March 1 of each even numbered year. The Biennial Report must be submitted on EPA Form 8700-13A, must cover generator activities during the previous year, and must include the following information:

(1) The EPA identification number, name, and address of the generator;

(2) The calendar year covered;

(3) The EPA identification number, name, and address for each off-site treatment, storage, or disposal facility in the United States to which waste was shipped during the year;

(4) The name and EPA identification number of each transporter used during the reporting year for shipments to a treatment, storage or disposal facility within the United States;

(5) A description, EPA hazardous waste number (from 40 CFR Part 261 (Subpart C or D), DOT hazard class, and quantity of each hazardous waste shipped off-site for shipments to a treatment, storage or disposal facility within the United States. This information must be listed by EPA identification number of each such off-site facility to which waste was shipped.

(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated.

(7) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984.

(8) The certification signed by the generator or authorized representative.

(b) Any generator who treats, stores, or disposes of hazardous waste on-site must submit a biennial report covering those wastes in accordance with the provisions of 40 CFR Parts 270, 264, 265, and 266. Reporting for exports of hazardous waste is not required on the Biennial Report form. A separate annual report requirement is set forth at 40 CFR 262.56.

§ 262.42 Exception reporting.

(a)(1) A generator of greater than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.

(2) A generator of greater than 1000 kilograms of hazardous waste in a calendar month must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the hand-

written signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

The Exception Report must include:

(i) A legible copy of the manifest for which the generator does not have confirmation of delivery;

(ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

(b) A generator of greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 60 days of the date the waste was accepted by the initial transporter must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the EPA Regional Administrator for the Region in which the generator is located.

§ 262.43 Additional reporting.

The Administrator, as he deems necessary under sections 2002(a) and 3002(6) of the Act, may require generators to furnish additional reports concerning the quantities and disposition of wastes identified or listed in 40 CFR Part 261.

§ 262.44 Special requirements for generators of between 100 and 1000 kg/mo.

A generator of greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month is subject only to the following requirements in this subpart:

(a) Section 262.40(a), (c), and (d), recordkeeping;

(b) Section 262.42(b), exception reporting; and

(c) Section 262.43, additional reporting.
(Information collection requirements approved by the Office of Management and Budget under control number 2050-0039)

ATTACHMENT “G”

HAZARDOUS WASTE TRAINING OUTLINE

- I. Training: This program is conducted by a person trained in hazardous waste management procedures either by education or prior work experience.
- II. Training Content:
 - 1. Identity of hazardous and non-hazardous wastes.
 - 2. Properties of hazardous wastes.
 - 3. Use of personal protective equipment.
 - 4. Handling of specific hazardous wastes.
 - 5. Packaging procedures.
 - 6. On-site or off-site transportation requirements.
 - 7. Recordkeeping requirements.
 - 8. Emergency response procedures.
- III. New employees: New employees will be trained within the first six months of employment or job assignment.
- IV. All employees: Training will be conducted on an annual basis.

All information regarding job title, job description, the amount and type of initial training is provided under employee orientation as new employee hiring procedures. Continued training will be documented per training session.

**HENKEL SURFACE TECHNOLOGIES
MANUFACTURING GROUP
SAFETY TRAINING
REQUIREMENTS**

SUBJECT	FREQUENCY			PLANT MANAGER	ADMIN	SUPV	PROD	SHIP/REC MAT'L HDL	MAINT	LAB	NEW HIRES
	ANNUAL	TWO YR	THREE YR								
Hazard Communication Program Hazard Recognition Physical and Health Hazards Safe Work Practices (Safety Rules) Personal Protective Equipment (Intro) Emergency Procedures (Communication, Evacuation, etc.)	X			X	X	X	X	X	X	X	X
Emergency Plans, Controls and Equipment Emergency Response/SPCC/SW3P Shutdown Procedures Alarms Spill Equipment Fire Equipment Drills and Exercises	X			X	X	X	X	X	X	X	X
Incident Reporting and Investigation	X			X	X	X	X	X	X	X	X
Confined Space, Work Permits and Electrical LockOut/TagOut Hot Work Line Breaking Confined Space Hazards Testing Attendants Rescue	X			X		X	X	X	X	X	X
Respirators/SCBAs	X			X		X	X	X	X	X	X
HF Safety	X			X		X	X	X	X	X	X
Hazardous Waste Management/RCRA	X			X		X		X		X	
Personal Protective Equipment	X			X	X	X	X	X	X	X	X
Hazwoper Awareness Level Eight hours initial, four hours refresher	X			X	X	X	X	X	X	X	X
DOT		X		X				X			
Powered Industrial Vehicles (Forklifts, etc.)	Recert		X			X	X	X			X

ATTACHMENT “H”

US EPA
HAZARDOUS
WASTE
GENERATOR ID
NUMBER

MID 057 676 124

ATTACHMENT “J”

WASTE CHARACTERIZATION CHECKLIST

Date: _____

Material for Disposal: _____

Quantity: _____

Type / Size of Container: _____

Is MSDS Available: Yes / No (If Yes, attach copy.)

Is Material Corrosive: Yes / No

Is Material Ignitable: Yes / No

Is Material Toxic? Yes / No

Is Material Reactive? Yes / No

Is Material an Oxidizer? Yes / No

Physical State: Solid___Liquid___Sludge___

% Solids: _____

Reason for Disposal: _____

Generator (Print): _____

(Signature): _____

To be completed by Lab Waste Manager:

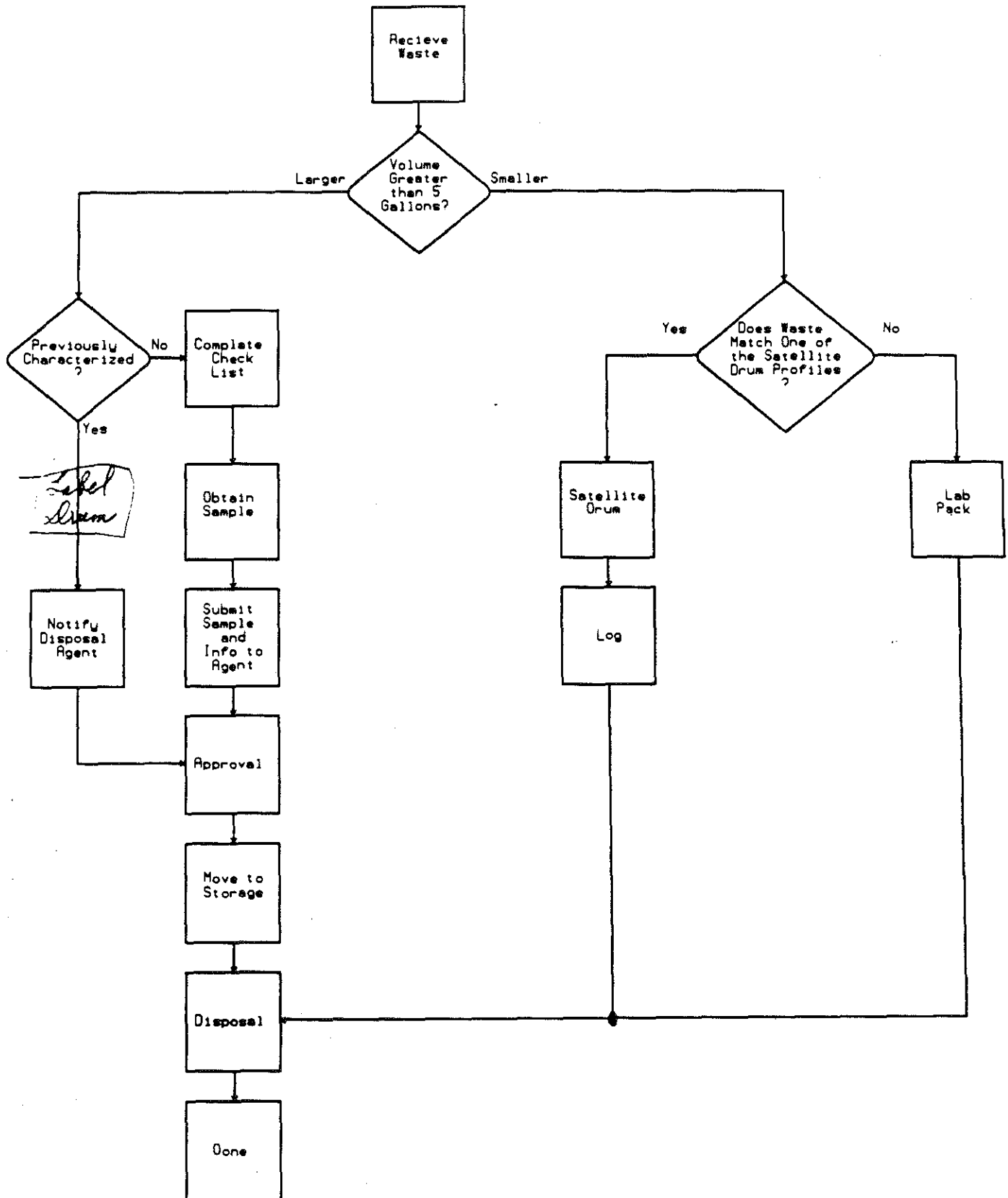
Date Received: _____

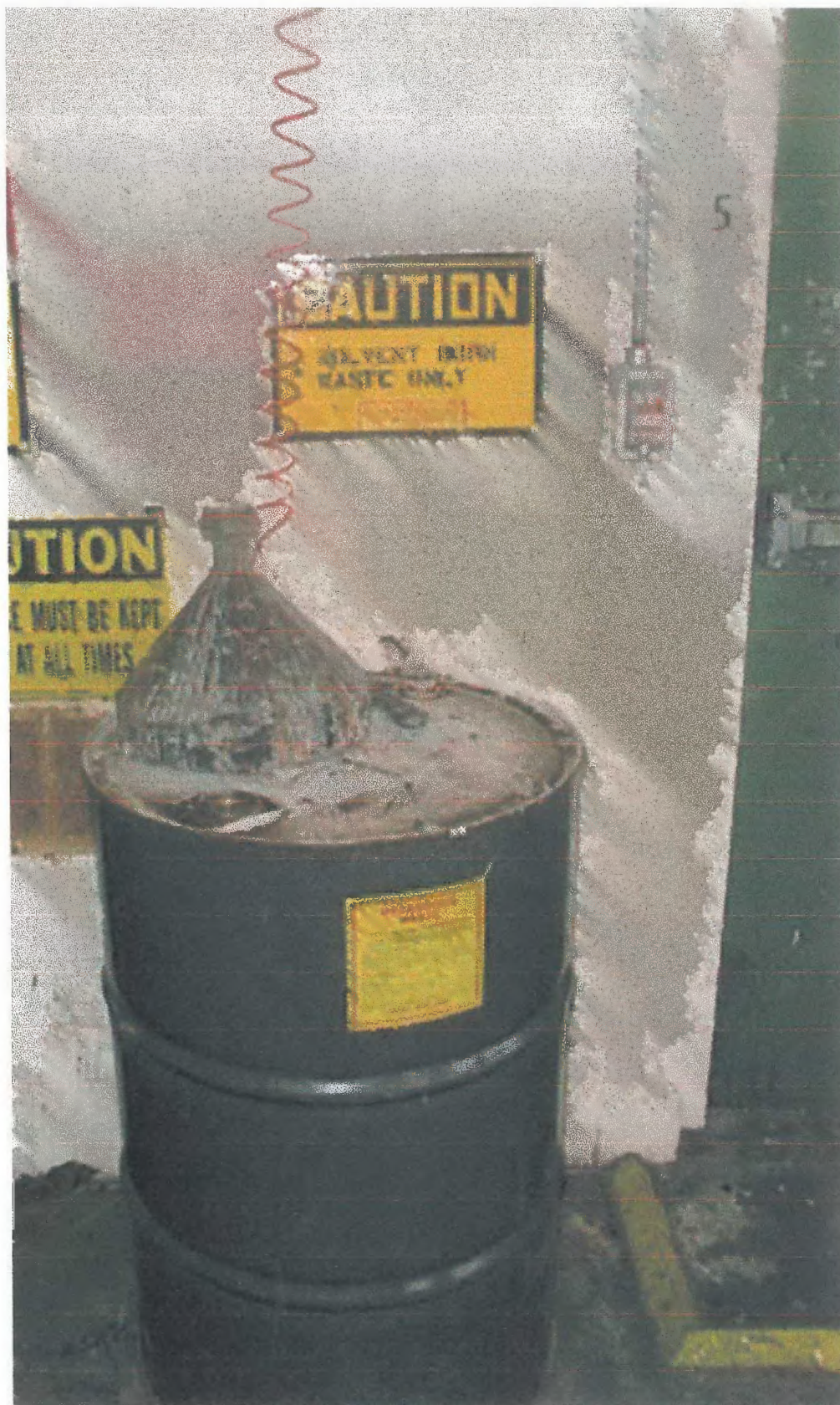
Waste Drum No: _____

Drums Labeled and Moved: _____

ATTACHMENT “K”

Waste Disposal







HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

FOR MORE INFORMATION, CONTACT THE NATIONAL POLICE ON PUBLIC SAFETY
DEPARTMENT OF THE U.S. DEPARTMENT OF JUSTICE

THE UNIVERSITY OF CHICAGO

ADDRESS _____

CITY OF _____ STATE OF _____

SECRET
DOCUMENT NO

ACQUAINTANCE
START DATE

1875

HANDLE WITH CARE

HANDLE WITH CARE

FINDING NUMBER FOUR (4)

- HAZARDOUS WASTE RESPONSIBILITIES
- ACCOMPANYING INTERNAL MEMO

MEMO

Date: January 17, 2000
To: M. Schubert
cc: J. Garavanta, B. Keck, G. Kohlsmith, T. Snell
From: R. Budnik
Subject: U.S. EPA Mandated Updates to Job Descriptions for Waste Handling

Mike,

One of the issues pointed out by the U. S. EPA and the Michigan DEQ during their inspection of the Madison Heights facility for Hazardous Waste Compliance in September, 1999 was that our job descriptions did not adequately reflect or identify the waste handling duties of various personnel in this building who handle hazardous wastes.

As a resolution to this I have generated a list of hazardous waste responsibilities broken down into two categories which reflect the different levels of involvement that various personnel have with our hazardous waste management program here in Madison Heights. I have also summarized the various generic job titles into two lists under either Category I or Category II.

I have attached the document with the lists and waste responsibilities to this memo. The last step in complying with the U. S. EPA's request to update our job descriptions would be to attach my documents to all job descriptions in HR for the personnel titles in the category lists. Another option would be to insert the appropriate waste handling responsibilities into the job descriptions based on the categories.

If you have any questions or concerns with this matter please do not hesitate to contact me.

Thanks,

Bob

MADISON HEIGHTS HAZARDOUS WASTE RESPONSIBILITIES BY JOB TITLE

Category I

- Identify and Characterize Hazardous Waste
 - Characteristic Wastes
 - Listed Wastes
 - Waste Determination
- Large Quantity Generator Requirements
 - Accumulation Period
 - Container Management
 - Storage & Inspections
 - Adsorbents & Stabilization
 - Labeling, Manifests, LDRs
 - Loading of Wastes
 - Emergency Preparedness
 - Emergency Procedures & Training
 - Satellite Storage and Accumulation
- Release Reporting & Biennial Reports
- Management of Miscellaneous Wastes
 - Fluorescent Light Bulbs
 - Batteries
 - Used Oils

Category II

- Identify and Characterize Hazardous Waste
 - Characteristic Wastes
 - Listed Wastes
 - Waste Determination
- Large Quantity Generator Requirements
 - Accumulation Period
 - Container Management
 - Labeling Requirements
 - Storage & Inspections
 - Emergency Procedures & Training
 - Satellite Storage and Accumulation

Category I

Maintenance Personnel
Shipping & Receiving
Custodial Service Group Leader
Regulatory Affairs Manager
HS&E Specialist
H&S Specialist
Director RAPA

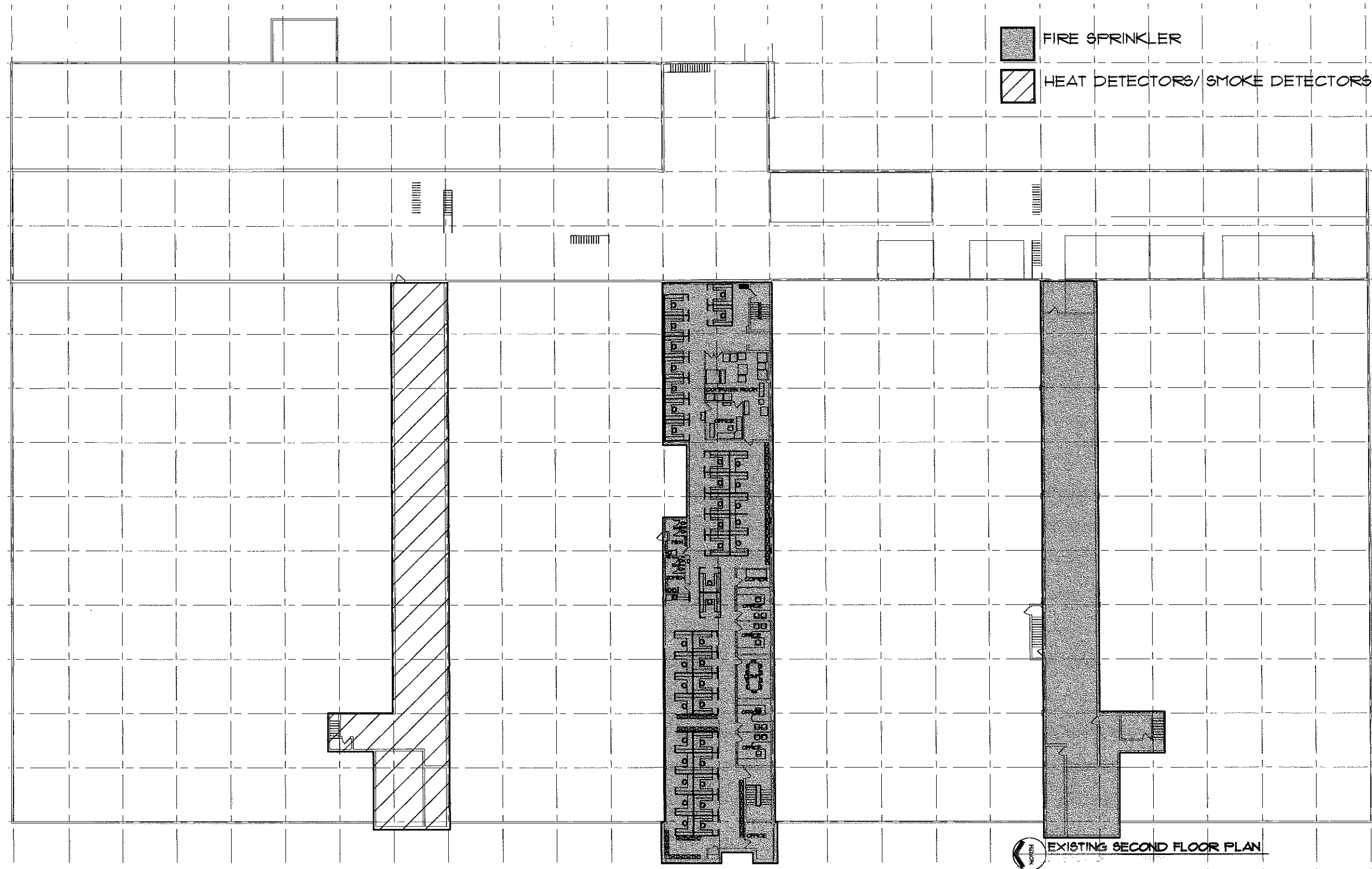
Category II

Technical Service Reps
Technicians
Chemists
Scientists
Laboratory Manager
Technical Managers
Technical Director
Application Painter



FINDING NUMBER FIVE (5)

- BUILDING LAYOUT



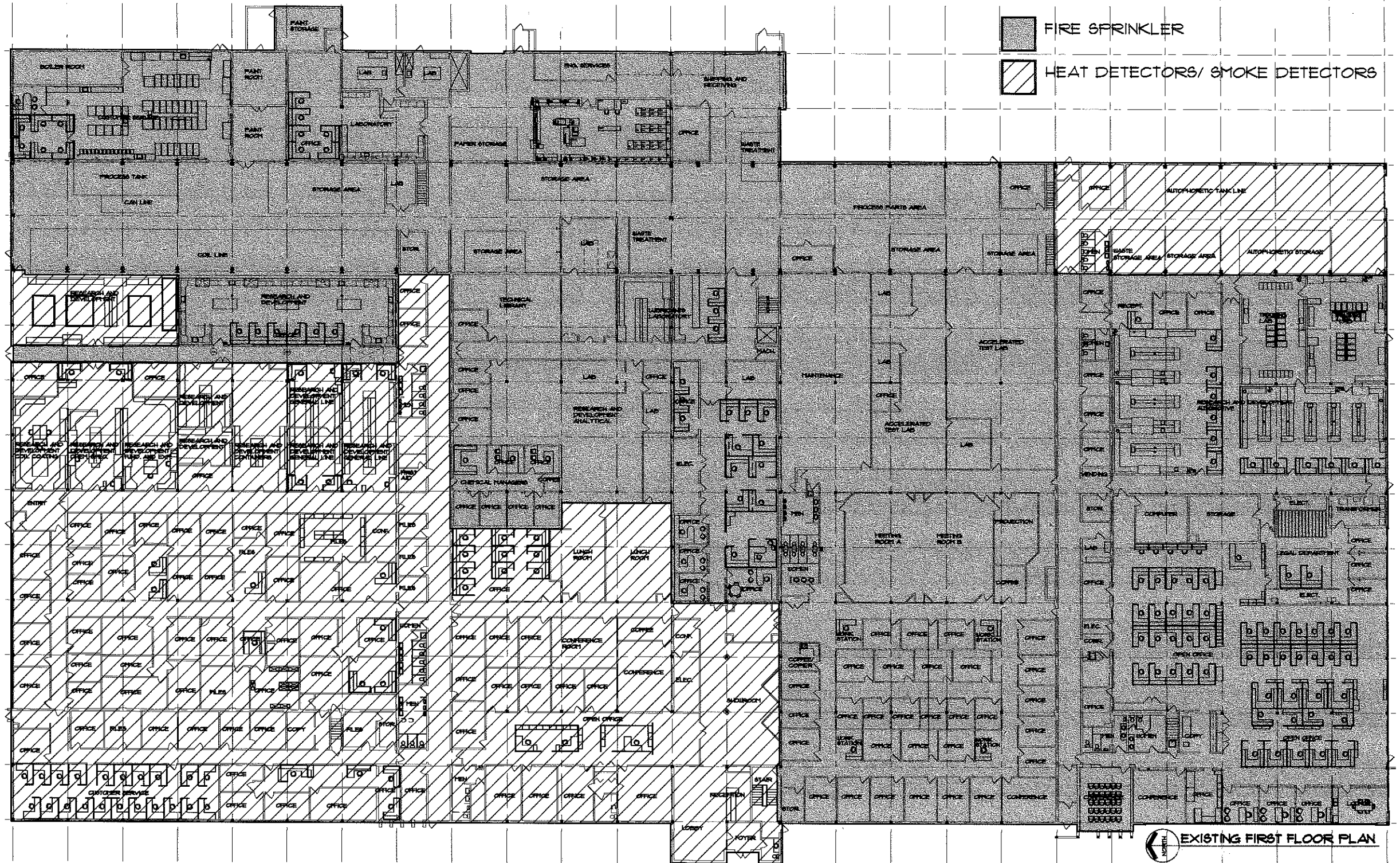
FIRE SPRINKLER



HEAT DETECTORS/ SMOKE DETECTORS



EXISTING SECOND FLOOR PLAN



FINDING NUMBER SIX (6)

- PAPERWORK FOR COMMUNICATION DEVICE
- PICTURE OF INSTALLED COMMUNICATION DEVICE

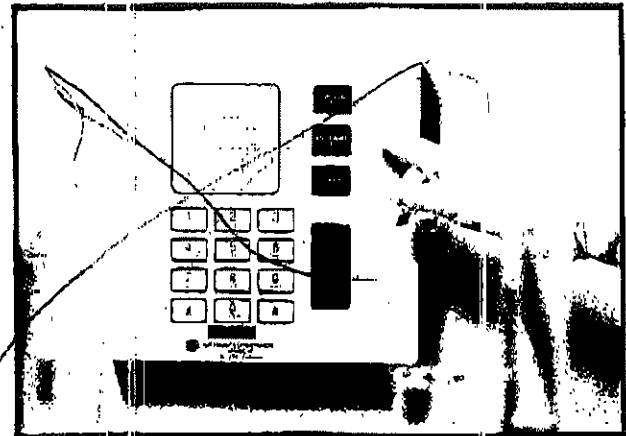
Al-Tronics Corporation has been a leader in industrial communications since 1946. Our roots are in the power generation market, a market known for adverse and challenging environmental conditions. Much of our equipment functions in these difficult climates for decades before requiring any type of service.

Our telephone product line is continually expanding. From standard-type industrial telephones, our offering has expanded to include high-tech specialty phones, intrinsically-safe telephones, and extra-durable, vandal-resistant telephones. The one thing our customers can always count on is the quality in all of our products. We were granted ISO9001 Registration in 1994, an achievement which testifies to the quality of our design and manufacturing processes.

The applications for our telephones are diverse: from golf courses, marinas, ski slopes, power plants, chemical plants, oil refineries, transit stations, clean rooms...anywhere requiring a durable, specialized telephone built for long-lasting, quality service.

CLEAN PHONE MODEL 295

- Completely smooth front panel is sealed to be particulate-free
- Auto answer option increases efficiency: personnel do not have to leave work stations to communicate
- Two autodial numbers for quick communications
- "Flash" button allows access to PBX features
- Oversized buttons easy for gloved hands to use
- Available in flush-mount or surface-mount

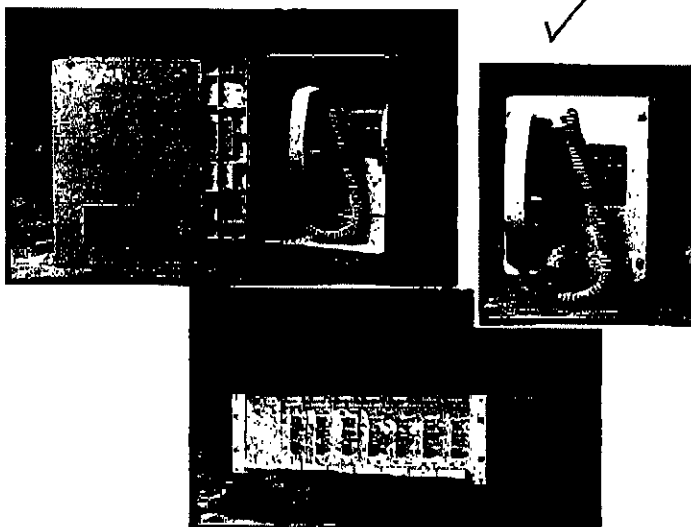


CLEAN PHONE

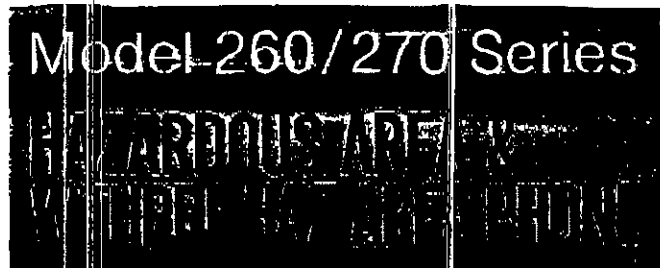
INTRINSICALLY-SAFE TELEPHONES MODELS 261 AND 271

*Replaces
270*

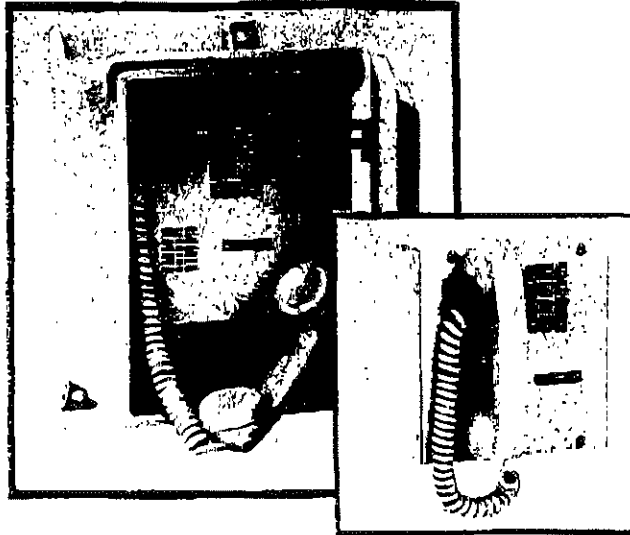
- Eliminates the possibility of an explosion by controlling power to the phone via a safety barrier.
- Economical replacement for Explosionproof Telephone in virtually any application.
- Ideal for chemical plants, refineries, grain elevators, and any facility with volatile and hazardous gases, dust, or chemicals.
- Telephone eliminates the need for expensive, sealed conduit.
- Housed in durable, glass-reinforced polyester for indoor and outdoor applications.



INTRINSICALLY-SAFE PHONES



Product Specification



- Safe for use in Hazardous Area
- No need for Expensive Conduit
- Built in Electronic Ringer
- Indoor or LEXAN® Weatherproof Housings
- DTMF (Tone) or Pulse

GAI-Tronics Model 260 Hazardous Area Phone and Model 270 Weatherproof Hazardous Area Phone are telephones designed for use in mines, grain elevators, off-shore installations and other environments where safety is the major consideration.

The Hazardous Area Phones consist of a telephone with a sealed touch pad and internal electronic ringer enclosed in a rugged steel housing for indoors or a LEXAN® Weatherproof housing for outdoors. The Model 270 is equipped with a door to further protect the handset and dial.

Instead of using expensive sealed conduit to provide safety, the Models 260 and 270 are powered through a modular, electrical safety barrier which is placed in a non-hazardous area. Standard two wire cable is then placed between the safety barrier and the telephone set.

The handset hook is made of cast aluminum with a nylon coating. A heavy-jacketed handset cord is constructed to withstand the most severe use. As options, a noise-cancelling dynamic microphone for high noise areas and an armored handset cord for extra protection are available.

The Models 260 and 270 will be submitted for approval to Underwriter's Laboratories under UL943 and to the Federal Communications Commission under Part 68. The submittals will be for Division 1 and Division 2 use.

The Model 260 Hazardous Area Phone and the Model 270 Weatherproof Hazardous Area Phone are just two of the telephone products available from GAI-Tronics for use in extreme environments. Contact your GAI-Tronics distributor for more information or to place an order.

SPECIFICATIONS:

Enclosure: Indoor	Heavy gauge steel with protective baked enamel finish.
Weatherproof	LEXAN® Polycarbonate Resin with gray urethane finish. Includes hinged door with gasket and cam-style latch.
Handset Cord:	6 ft. Retractable (Hard Wired).
Operating Temperature:	Ambient temperatures from -25°C to +70°C.
Dimensions:	14.8 (371) H by 10.9 (276) W by 10.5 (267) D inches (mm) including handle.
Mounting:	Four (4) mounting lugs having 7/16" diameter holes.
Connections:	6 1/2 ft. (2m) cable with modular plug. Cable entrance via strain relief in 13/16 inch (21mm) hole. Optional field connections to internal terminal block with 8/32 screws.

GAI-TRONICS CORPORATION
"CUSTOMER ORIENTED FOR SERVICE"

NON-HAZARDOUS AREA

TO PBX
OR C.O.

ELECTRICAL
SAFETY
BARRIER

HAZARDOUS AREA

260T-14 270T-14
260P-14 270P-14
ALL TELEPHONE

CLASS I GROUP C, D CLASS I GROUP C, D
CLASS II GROUP E, F CLASS II GROUP G
CLASS III CLASS III

ORDERING INFORMATION

To order, list the model number and appropriate option code if any.

Model Number

- 260T-14 Rugged Hazardous Area Phone with DTMF (Tone)
- 260P-14 Rugged Hazardous Area Phone with Pulse
- 270T-14 Weatherproof Phone with DTMF (Tone)
- 270P-14 Weatherproof Hazardous Area Phone with Pulse

Option Code

- A Armored Handset Cord
- S Spring Return Door (For Weatherproof Phone Only)
- L Lockable Door (with two keys) (For Weatherproof Phone Only)
- N Handset with Dynamic Noise-Cancelling Microphone

Example

Model Number 270T-14-AS Option Code

This example designates a Weatherproof Hazardous Area Phone with DTMF and an armored handset cord and a spring return door.

Optional Pole Mounting Hardware:

Model Number 12002-002 provides bracket, two 52" stainless steel straps, and the necessary hardware for mounting on a pole up to 16" in diameter.

To place an order contact your Distributor.

GAI-TRONICS RESERVES THE RIGHT TO MAKE CHANGES IN MATERIALS AND SPECIFICATIONS WITHOUT PRIOR NOTICE



GAI-TRONICS
CORPORATION



FINDING NUMBER EIGHT (8)

- EMERGENCY PLAN NOTIFICATION/RECEIPT LETTERS
- RETURN RECEIPT CARDS FOR PLAN DELIVERY
- UPDATED FACILITY CONTINGENCY PLAN

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

1. Addressee's Address
☐ Restricted Delivery
Consult postmaster for fee.

2. Article Addressed to:
Marine Collection
Conrad
8631 W. Jefferson
Detroit, MI 48209

3. Article Addressed to:
4a. Article Number: 2107855-358
4b. Service Type:
☐ Registered
☐ Express Mail
☒ Return Receipt for Merchandise
5. Received By: (Print Name)
John Grackel
6. Signature: (Addressee or Agent)
John Grackel
7. Date of Delivery: JAN 6 2000
8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

Thank you for using Return Receipt Service

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

1. Addressee's Address
☐ Restricted Delivery
Consult postmaster for fee.

2. Article Addressed to:
William Beaumont
Hospital
3601 W. 13 Mile Rd.
Royal Oak, MI 48073

3. Article Addressed to:
4a. Article Number: 2107855-284
4b. Service Type:
☐ Registered
☐ Express Mail
☒ Return Receipt for Merchandise
5. Received By: (Print Name)
Michael M. Harvey
6. Signature: (Addressee or Agent)
Michael M. Harvey
7. Date of Delivery: 1-6-00
8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

Thank you for using Return Receipt Service

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

1. Addressee's Address
☐ Restricted Delivery
Consult postmaster for fee.

2. Article Addressed to:
Fine Department
Cty of Madison
340 W. 13 Mile Rd.
Madison Heights, MI 48071

3. Article Addressed to:
4a. Article Number: 2107855-282
4b. Service Type:
☐ Registered
☐ Express Mail
☒ Return Receipt for Merchandise
5. Received By: (Print Name)
John Grackel
6. Signature: (Addressee or Agent)
John Grackel
7. Date of Delivery: JAN 6 2000
8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

Thank you for using Return Receipt Service

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

1. Addressee's Address
☐ Restricted Delivery
Consult postmaster for fee.

2. Article Addressed to:
Police Dept.
Cty of Madison
340 W. 13 Mile Rd.
Madison Heights, MI 48071

3. Article Addressed to:
4a. Article Number: 2107855-281
4b. Service Type:
☐ Registered
☐ Express Mail
☒ Return Receipt for Merchandise
5. Received By: (Print Name)
John Grackel
6. Signature: (Addressee or Agent)
John Grackel
7. Date of Delivery: JAN 6 2000
8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

Thank you for using Return Receipt Service

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1994

1. Addressee's Address
☐ Restricted Delivery
Consult postmaster for fee.

2. Article Addressed to:
Madison Community
Hospital
30671 Stephenson
May
Madison Heights, MI 48071

3. Article Addressed to:
4a. Article Number: 2107855-283
4b. Service Type:
☐ Registered
☐ Express Mail
☒ Return Receipt for Merchandise
5. Received By: (Print Name)
John Grackel
6. Signature: (Addressee or Agent)
John Grackel
7. Date of Delivery: JAN 6 2000
8. Addressee's Address (Only if requested and fee is paid):

PS Form 3811, December 1994

Thank you for using Return Receipt Service



December 21, 1999

Oakland County LEPC
Emergency Management Div.
1200 N. Telegraph Rd.
Pontiac, MI 48341

Gentlemen:

Attached is the Emergency Response / Evacuation Plan for Henkel Surface Technologies located at 32100 Stephenson Highway, Madison Hts., MI 48071.

Please return this letter with one of the boxes marked below applicable to your requirements.

☐ YES, PLEASE PROVIDE ALL UPDATES TO THIS PLAN.

☒ NO, DO NOT SEND ANY ADDITIONAL INFORMATION REGARDING THIS PLAN.

Lucia Smith 1/7/00 LEPC Info Coord
SIGNATURE DATE TITLE

Thank you in advance for your cooperation.

Very truly yours,

HENKEL SURFACE TECHNOLOGIES

Thomas M. Snell
Thomas M. Snell
Maintenance Facility Planning Manager



Telephone: (248) 583-9300



December 21, 1999

Police Department
City of Madison Hts.
280 W. 13 Mile Rd.
Madison Hts., MI 48071

Gentlemen:

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☐ NO, DO NOT SEND ANY ADDITIONAL INFORMATION REGARDING THIS PLAN.

SIGNATURE

DATE

TITLE

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Very truly yours,

HENKEL SURFACE TECHNOLOGIES

Thomas M. Snell
Maintenance Facility Planning Manager



December 21, 1999

Fire Department
City of Madison Hts.
340 W. 13 Mile Rd.
Madison Hts., MI 48071

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SIGNATURE

DATE

TITLE

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HENKEL SURFACE TECHNOLOGIES

Thomas M. Snell
Maintenance Facility Planning Manager



December 21, 1999

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Madison Hts., MI 48071

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SIGNATURE

DATE

TITLE

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HENKEL SURFACE TECHNOLOGIES

Thomas M. Snell

Maintenance Facility Planning Manager

December 21, 1999

William Beaumont Hospital
3601 W. 13 Mile Rd.
Royal Oak, MI 48073

Gentlemen:

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REGARDING THIS PLAN.

SIGNATURE

DATE

TITLE

Thank you in advance for your cooperation.

Very truly yours,

HENKEL SURFACE TECHNOLOGIES



Thomas M. Snell

Maintenance Facility Planning Manager



December 21, 1999

Marine Pollution Control
8631 W. Jefferson
Detroit, MI 48209

Gentlemen:

Attached is the Emergency Response / Evacuation Plan for Henkel Surface Technologies located at 32100 Stephenson Highway, Madison Hts., MI 48071.

Please return this letter with one of the boxes marked below applicable to your requirements.

☐ YES, PLEASE PROVIDE ALL UPDATES TO THIS PLAN.

☐ NO, DO NOT SEND ANY ADDITIONAL INFORMATION REGARDING THIS PLAN.

SIGNATURE

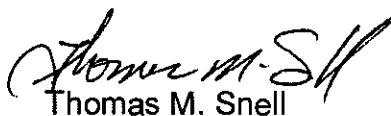
DATE

TITLE

Thank you in advance for your cooperation.

Very truly yours,

HENKEL SURFACE TECHNOLOGIES


Thomas M. Snell

Maintenance Facility Planning Manager



December 21, 1999

Oakland County LEPC
Emergency Management Div.
1200 N. Telegraph Rd.
Pontiac, MI 48341

Gentlemen:

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☐ YES, PLEASE PROVIDE ALL UPDATES TO THIS PLAN.

☐ NO, DO NOT SEND ANY ADDITIONAL INFORMATION REGARDING THIS PLAN.

SIGNATURE

DATE

TITLE

Thank you in advance for your cooperation.

Very truly yours,

HENKEL SURFACE TECHNOLOGIES

Thomas M. Snell

Maintenance Facility Planning Manager

Henkel Surface Technologies

32100 Stephenson Highway
Madison Heights, Michigan 48071

Emergency Response / Evacuation Plan

Spill Prevention Plan

December, 1999

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Emergency Response and Evacuation Plan

1. Purpose and Objective of Plan

The Purpose of this plan is to provide an organization that can be called into action to cope with emergencies at the Madison Heights facility of Henkel Surface Technologies. The plan objectives are to protect personnel, property, and to provide information and communication services to our employees and to the public.

2. Types of Emergencies

Emergencies can originate internally or from outside sources. An emergency can be any of the following: toxic fume release, chemical spill, an explosion or fire, a tornado, a civil disorder, a bomb threat, or any action at the Madison Heights facility resulting in a threat to employees and/or the surrounding community.

3. Activation of Evacuation Plan during Normal Business Hours

If or when an emergency arises, dial "0" from any phone within the facility, tell the operator there is an emergency. Remain on the phone and indicate where and what the emergency is.

The operator, upon notification of an emergency, will immediately contact one of the following, calling in the order listed until a contact is made.

Thomas SnellExt 2167
Jack GaravantaExt 4830
Maintenance Dept.....Ext 2166

The respondent is responsible to judge the severity of the emergency and advise the operator to activate the evacuation alarm when necessary.

The main switchboard operator will activate the evacuation alarms. Response to the alarm requires an **immediate evacuation of the facility**. Follow the posted evacuation path to the nearest assembly area. An orderly egress is mandatory.

4. Evacuation/Assembly Areas

When evacuation of the facility is required, the following procedure will be followed. This will permit an orderly, safe evacuation from the building, and ensure a prompt headcount of personnel.

Evacuation/Assembly Areas (Cont.)

When advised, or at the sound of the evacuation alarm, **all personnel** shall proceed promptly out of the facility using one of the posted evacuation routes to the nearest assembly area.

Familiarize yourself with the posted facility evacuation route. Each area of the facility has an "outside home assembly area". Once outside, proceed quickly to your home assembly area for headcount verification.

Personnel responsible for visitors, such as salespeople, vendors, contractors, etc., shall escort them out of the building.

All Managers/Supervisors shall assure that all personnel are out of their area of responsibility before leaving the building.

When the emergency is declared under control by the Emergency Control Chief, employees will be allowed to re-enter the facility after notification via an announcement over the paging system or verbal communication.

5. Organizational Chart

		<u>Alternate</u>
<u>Emergency Control Chief:</u>	T. Snell	A. Wunderlich
Environmental Coordinator:	J. Garavanta	B. Budnik
Technical Advisor:	G. Beyer	J. Kramer
Public Relations:	M. Schubert	K. Lehman
Assembly Area Coordinators:		
North:	A. Burczycki	T. Prescott
East:	J. Kramer	M. Maun
South:	G. Cormier	E. Montrose
West:	G. Stanley	P. Jurnis
Headcount Coordinators:	Area Appointees and Facility Secretaries	

6. **Job Descriptions**

Emergency Control Chief - T. Snell

This Individual coordinates and directs all emergency activities during and after the emergency. He is the final authority, makes the pertinent decisions needed to bring the emergency under control, and takes full charge at the time of the emergency. All of the coordinators consult with this individual during the emergency.

Environmental Coordinator - J. Garavanta

This individual is responsible for determining if, and to what extent contaminants have been released into public waters or the atmosphere during the emergency. He is also responsible for advising the emergency control chief if the emergency appears to have an imminent effect on the nearby community. If the emergency concerns a chemical spill, this individual is responsible for notifying the appropriate National Response Center, State Response Center and/or Local Agencies, MDNR or DWSD.

Public Relations Coordinator - M. Schubert

Because the public and the news media have a legitimate interest in emergencies, this individual is responsible for providing management-approved information to the news media, as well as to all Henkel Surface Technologies employees.

Assembly Area Coordinators

Each of the four (4) assembly areas have an "Assembly Area Coordinator". Their responsibilities include:

Quickly evacuate the facility to the respective assembly area and remain at the assembly area unless otherwise instructed.

Making oneself known to the Headcount Coordinators.

Communicating missing employee information to the Coordinator at the control center, i.e., dispatching alternate Assembly Area Coordinators, with data, to the Control Center.

Keep unauthorized personnel from entering the building until the emergency is over.

Headcount Coordinators

These individuals are responsible for monitoring an up-to-date employee roster for their assembly area. An actual headcount shall begin only when notified by the Assembly Area Coordinator. Headcount Coordinators are to report only missing or unaccounted personnel to the Assembly Area Coordinator at the assembly area.

7. **Plan Detail**

When an evacuation alarm has sounded, the Emergency Control Chief, Environmental Coordinator, and Public Relations Coordinator will meet at the Primary Control Center (Shipping and Receiving Office). If this area is in the emergency area, the alternate Control Center (Main Entrance/Reception Area) will be utilized.

When evacuation of the facility is required, the Emergency Control Chief will request notification of all applicable required emergency help (fire / police / medical / environmental), as necessary.

The Emergency Control Chief, or his alternate, will investigate the site of the emergency, if appropriate.

The Emergency Control Chief, or his alternate will direct all external emergency help to the location of the emergency.

The Emergency Control Chief will determine when the building is safe to re-enter after the emergency has been identified and has ended.

8. **Equipment/Location**

Emergency equipment consists of:

Flashlights, telephone lists, facility maps, copy of Emergency Plan, portable radio and batteries.

Equipment location:

Primary Control Center (Shipping and Receiving Office) Alternate Control Center (Main Entrance, Reception Area)

9. **Telephone Service**

The Rolm Telephone system extends throughout the entire facility and emergency call numbers are posted on each phone. The telephone system is on an emergency generator to operator in the event of a power failure.

10. **Emergency Phone Numbers**

Emergency:

Police, Fire, Medical Service 911

Non-Emergency

Medical Service (EMS) 248-588-3605
**Fire, 340 W. 13 Mile Rd., Mad. Hts., MI 48071 248-588-3605
**Police, City of Mad. Hts., 280 W. 13 Mile Rd., Mad. Hts. 248-585-2100
State Police 248-332-9132

Hospitals

**Madison Community, 30671 Stephenson Hwy., Mad. Hts. 248-588-8000
**William Beaumont - Royal Oak, 3601 W. 13 Mile Rd., R.O. 248-551-5000

Red Cross

Bloomfield 248-334-3575
Roseville 248-778-5600

Regulatory Agencies

Dept. of Environmental Quality (DEQ) 800-841-6795
E.P.A. 313-676-6500
Michigan Dept. of Consumer Industries (CIS) 517-322-1831

Security

A.D.T. Security system 248-583-2444
(System Number P160200942)

Chemical Spills/Emergencies

**Marine Pollution Control, 8631 W. Jefferson, Det., 313-849-2333
Detroit Water and Sewage 313-224-4775
State Response Center 800-292-4706
RAPA ext. 2273
National Response Center (NRC) 800-424-8802

Miscellaneous

Legal Dept. ext. 4665
Oakland County Health Dept. 810-424-7000
Poison Control 800-462-6642
Power Failure 313-646-0900
Water/Sewer Main Break 248-589-2294
Gas Leak 248-433-5844
**Oakland County LEPC, Emergency Management Div. 248-858-5323
1200 N. Telegraph Rd., Pontiac, MI 48341
** Any revisions must be mailed to these locations.

11. Tornadoes

A tornado emergency is a special case emergency. Tornadoes are nature's most violent storms and are normally monitored by the National Weather Service. A **Tornado Watch** means that conditions are right for tornadoes to develop. A **Tornado Warning** means that a tornado has been sighted in the area and all personnel should proceed to the designated shelter areas.

A tornado or a severe weather condition warning is normally issued by the National Weather Service through commercial radio and TV stations or by local community sirens. When a Tone Alert is received at the switchboard from Oakland County, the Switchboard Operator will announce the warning. (See attachment Number 1). All personnel should **immediately** proceed to a designated shelter area. The evacuation alarm **Should Not** be activated. Remain in the shelter area until the all-clear has been issued.

Shelter Areas

- Aisle A** - East/West Hall outside of Purchasing offices, between the severe weather signs.
- Aisle D** - East/West Hall between MSDS File room and First Aid room, between the severe weather signs.
- South end** - East/West Hall between Autophoretic labs and Engineering, between the severe weather signs.

In the event of a tornado warning, the Emergency Response Officers and available Alternates are to assemble in the "Alternate Control Center".

Tornado/Weather Emergency

In the event that the Tone Alert indicates a Warning has been issued, use the page system immediately to announce the following:

"Oakland County has issued a Tornado / Severe Weather Warning. All personnel are to immediately proceed to a designated shelter area. I repeat----- All personnel are to proceed to a designated shelter area."

"Shelter Areas are as follows:

The three internal East/West Aisles

Aisle A - Outside of Purchasing.

Aisle D - Outside of First Aid.

South End - Between Autophoretic Lab and Engineering entrance.

"Notify all members in closed door sessions in your immediate area."

After the page announcement, notify the Executive Area via phone.

An am/fm radio will be consulted for an "all-clear" signal or a tone alert will be provided.

KEY ON-SITE PERSONNEL**Day and Afternoon Shift****Office Phone****Home Phone****Emergency Coordinator**

Tom Snell, Facility Manager
15216 Goutz Rd.
Monroe, MI 48162

(248) 577-2167

(734) 457-4229

Environmental Coordinator

Jack Garavanta, Director, RAPA
5242 Cardinal Drive
Troy, MI 48098

(248) 589-4830

(248) 641-7367

Robert Budnik
5538 Klettner Road
St. Clair, MI 48079

(248) 585-4322

(810) 326-0023

Public Relations

Mike Schubert, Vice President H.R.
1827 Village Green Blvd., Apt. 201
Rochester Hills, MI 48307
(248) 853-2437

(248) 589-4603

(248) 853-2437

Technical Advisor

George Beyer, Technical Manager
1352 Madison
Troy, MI 48083

(248) 577-2086

(248) 689-8363

The Emergency Response team members are detailed in the Emergency Response and Evacuation Plan.

Activation of Evacuation Plan - Outside of Normal Working Hours

Emergencies can originate internally or from outside sources. An emergency can be any of the following: toxic fume release, significant chemical spill, an explosion or a fire, a tornado or any action at the facility resulting in a significant threat to employees and/or the surrounding community.

When an after-hours or weekend emergency arises:

1. Dial 88 and loudly, but clearly announce three (3) times:
"This is an emergency - evacuate the building at the nearest exit and proceed to the east employee parking lot."
2. Call ADT Security at 008 or 248-583-2444. Advise company name and system number P160200942, the nature of the emergency and the fact that the building is being evacuated.
3. ADT will contact the respective personnel.

Evacuation/Assembly Areas

All building occupants are to take the nearest exit and quickly proceed to the east parking lot assembly area.

The after hours register located in the Shipping and Receiving employee entrance must be checked to determine the possibility of personnel remaining in the building. The names and location of unaccounted for personnel should be given to the emergency responders.

When the emergency is under control, the facility may be re-entered only under the direction of the emergency response personnel.

GENERAL PURPOSE

This Spill Prevention Control and Countermeasure (SPCC) and Emergency Response Plan (plan) was designed and implemented according to:

- United States Environmental Protection Agency (USEPA) regulations on oil pollution prevention established in 40 Code of Federal Regulations (CFR) 112
- Pollution Incident Prevention Plan (PIPP) required by the State of Michigan
- Slug Control/Spill Prevention Plan (SC/SPP) required by the Detroit Water and Sewerage Department (DWSD)
- Other local, state and federal regulations that require a facility to have a emergency response/spill plan such as the Resource Conservation and Recovery Act (RCRA), the Clean Air Act (CAA) and the Comprehensive Emergency Response, Compensation and Liability Act (CERCLA) and its amendments

This plan focuses on Henkel Surface Technologies (HST) Madison Heights facility. In accordance with these requirements, the following plan is designed to minimize or prevent damages to human health and the environment in the event of a natural disaster such as a tornado, fire, explosion, or release involving chemicals. This plan includes procedures by which HST proposes to prevent pollution of the surface and groundwaters of this state from oil and chemicals storage and blending areas as well as transferring stations. This plan shall also be used as a procedure for the control of spills through preventative maintenance, inspections and standard operating procedures.

The plan establishes a procedure of immediate action in the event of a chemical release. Emergency notification and cleanup procedures have been incorporated into this plan and will be used in case of a discharge of oil or chemicals into the navigable waters of the United States, surface or DWSD sewage collection and treatment system.

For the purposes of this plan, the following definitions shall apply:

- "Discharge" includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping that is non-routine, non-customary or accidental.
- "Navigable waters" includes (1) all navigable waters of the United States and tributaries of such waters, (2) interstate waters, including interstate wetlands, (3) interstate lakes, rivers, and streams used by interstate travelers for recreational or other purposes, and (4) interstate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

- “Surface” includes surrounding paved or unpaved areas.
- “Reportable Quantity” the amount of a spill or release of a specific substance above which a report must be made.
- A reportable quantity (regarding oil or chemical releases) would include discharges of oil or chemicals that:
 - ◆ Violate applicable water and air quality standards
 - ◆ Cause a film or sheen upon or discoloration of the surface water or adjoining shorelines
 - ◆ Cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines
 - ◆ May adversely affect the surface or ground waters of the State of Michigan
 - ◆ May adversely affect the operation of the DWSD treatment plant

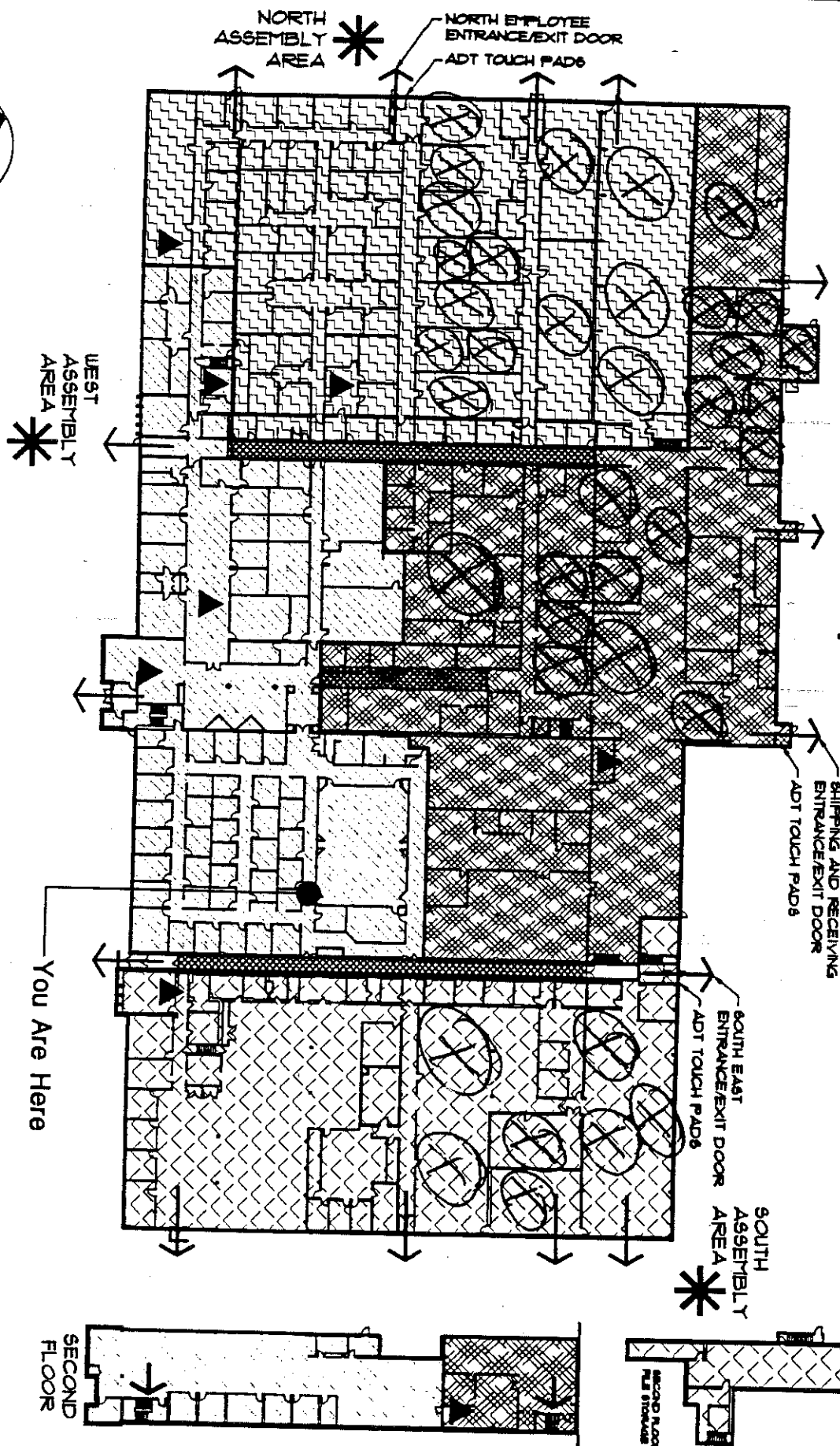
GENERAL INFORMATION

Name and location of facility:

Henkel Surface Technologies
 32100 Stephenson Highway
 Madison Heights, Michigan 48071

(248) 583-9300

EAST FIGURE 1
ASSEMBLY
AREA *



CHEMICAL STORAGE AND LAB AREA



SHELTER AREA

BYPASS PHONE

HENKEL SURFACE TECHNOLOGIES - FLOOR PLAN MADISON HEIGHTS, MICHIGAN

HOURS OF OPERATION:**PLANT PERSONNEL/PLANT SECURITY AND FIRE PROTECTION**

Henkel Surface Technologies typical operations are on a one-shift basis, from 6:00 a.m. until 10:00 p.m., Monday through Friday; occasionally, Saturday work is also conducted. Approximately 275 employees are present during the day shift. The approximate number of staff on hand during the second shift is approximately four. The facility is closed during observed holidays.

All doors are secured after normal operating hours. In the case of a fire, the facility is wired directly to an alarm company who will immediately call the fire department.

The facility has fire extinguishers as required by fire codes. The fire extinguishers are located in the office, storage, and research and development areas of the facility. Training of plant personnel in the use of fire extinguishers is provided by the fire protection company.

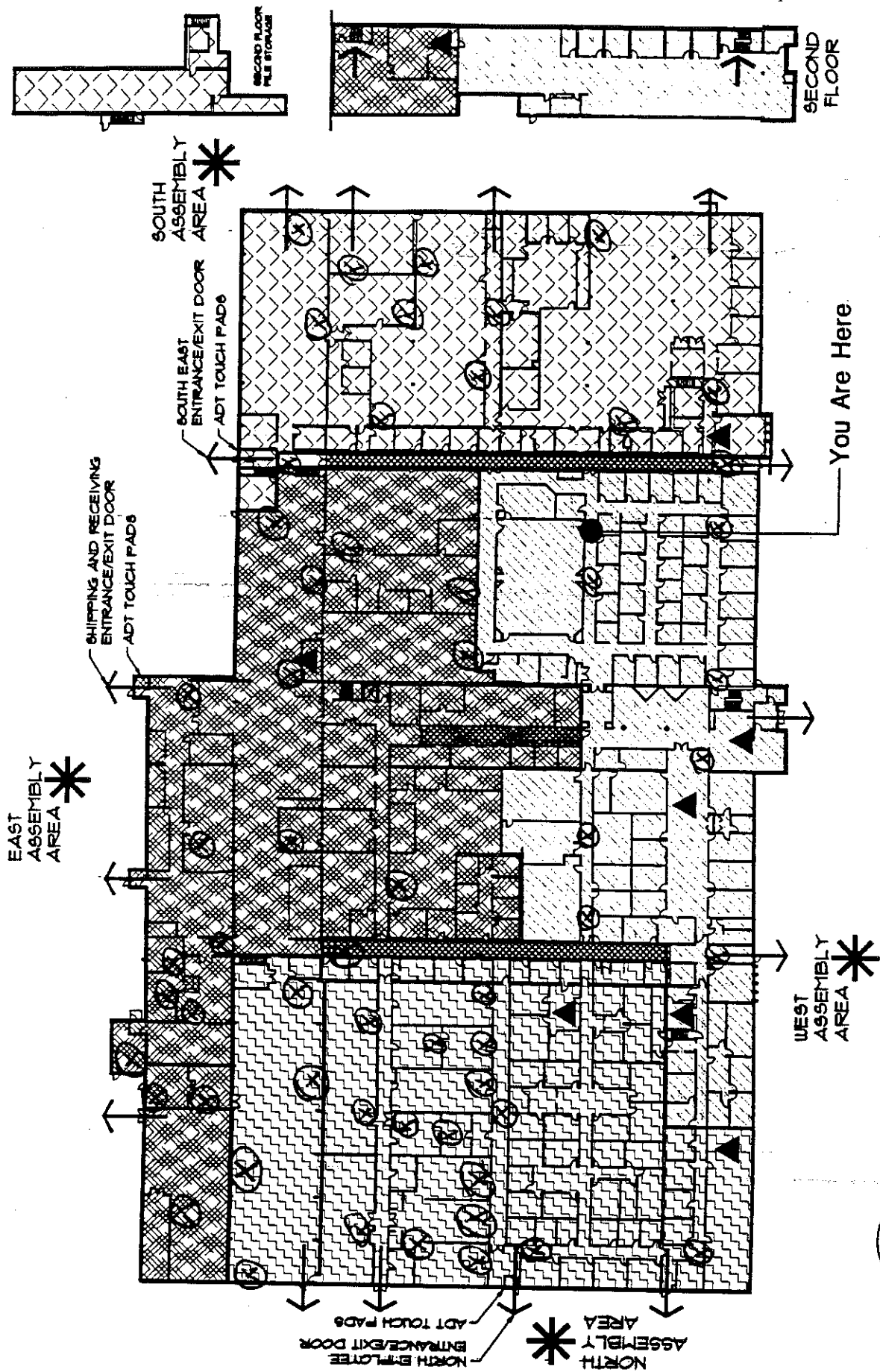
3.0 PROCESS DESCRIPTION

Primary operations conducted at Henkel Surface Technologies include research and development/administrative functions for the metal finishing industry

Chemicals used on-site include both acids, alkalis, and metal working lubricants. Chemicals are delivered via truck in bags (for dry products), 55 gallon drums and 275-400 gallon totes and small packages.

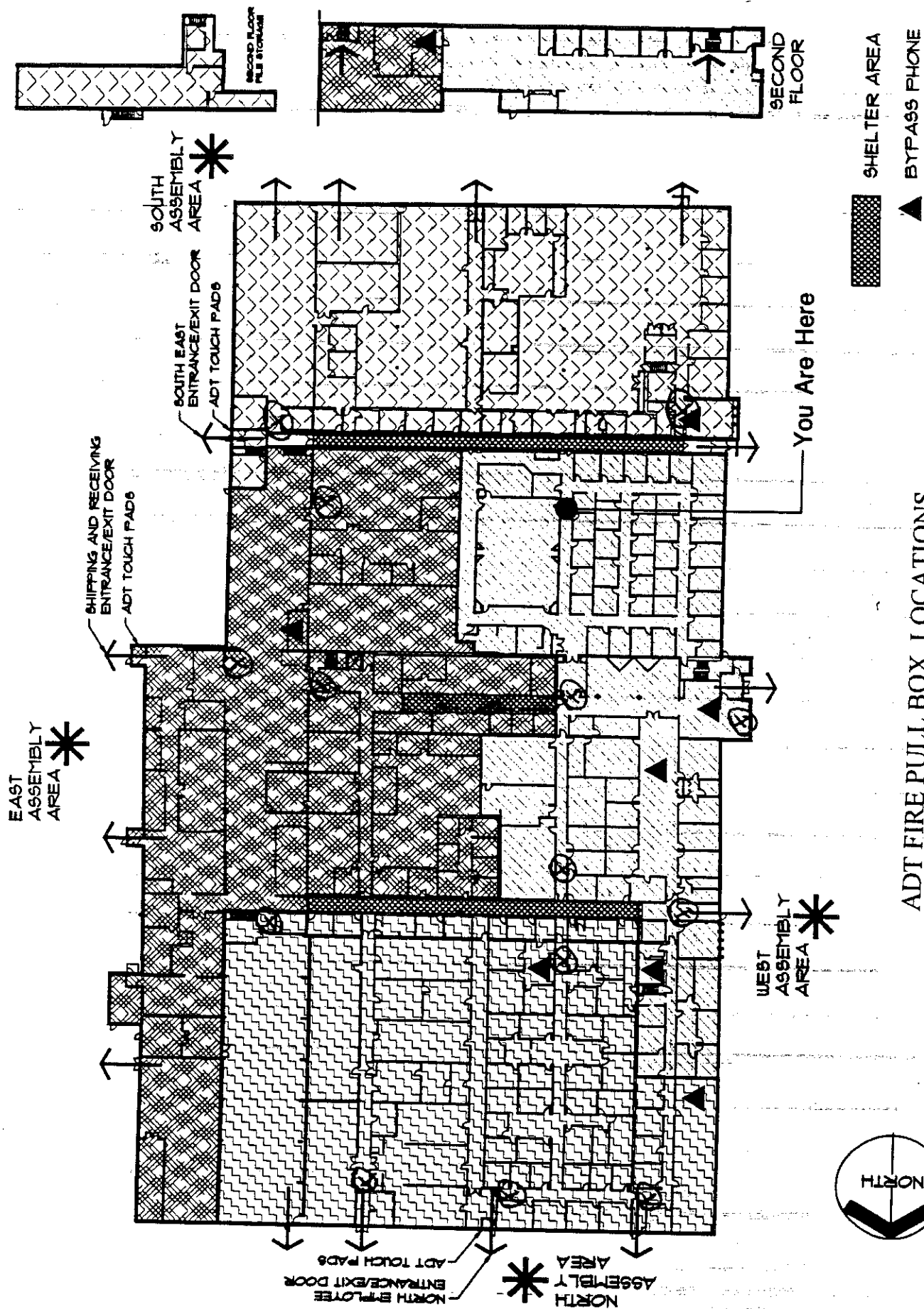
Chemical Storage

Chemicals are stored indoors. Raw materials contained in 275-400-gallon totes and 55-gallon drums are stored in the main building. Most laboratory chemicals are in containers of 5 gallons or smaller.



FIRE EXTINGUISHER LOCATIONS

HENKEL SURFACE TECHNOLOGIES - FLOOR PLAN MADISON HEIGHTS, MICHIGAN



ADT FIRE PULL BOX LOCATIONS

HENKEL SURFACE TECHNOLOGIES - FLOOR PLAN MADISON HEIGHTS, MICHIGAN

Products handled by Henkel Surface Technologies include the following:

- Oxidizer
- Corrosive (Acid and Alkaline)
- Flammable (Solvents)

Description of Discharges from Chemical Storage and Labs

Liquid waste discharges from chemical storage and labs are limited to the east side of the main building. The waste streams are treated in the wastewater treatment plant area.

Concentrated spills are contained and pumped to an on-site container. The chemical wastes may then be either reprocessed or sent off-site for disposal. Concentrated spills are not treated in the effluent collection and treatment area.

FACILITY CHEMICAL STORAGE AND LAB AREA LAYOUT

See Figure 1, page 11..

INVENTORY OF MATERIALS STORED IN THE FACILITY

An inventory of materials is available by Henkel Surface Technologies at all times. (see Appendix B). The listing includes the incoming products and finished products at the facility at any time.

LOCATION OF MATERIAL SAFETY DATA SHEETS

Material Safety Data Sheets for chemicals are located as follows:

Raw materials and Finished goods - in the RAPA office area.

NOTIFICATION PROCEDURES

In the event of a fire, explosion, or release of oil or chemicals associated with the storage and production areas, notification procedures are as follows:

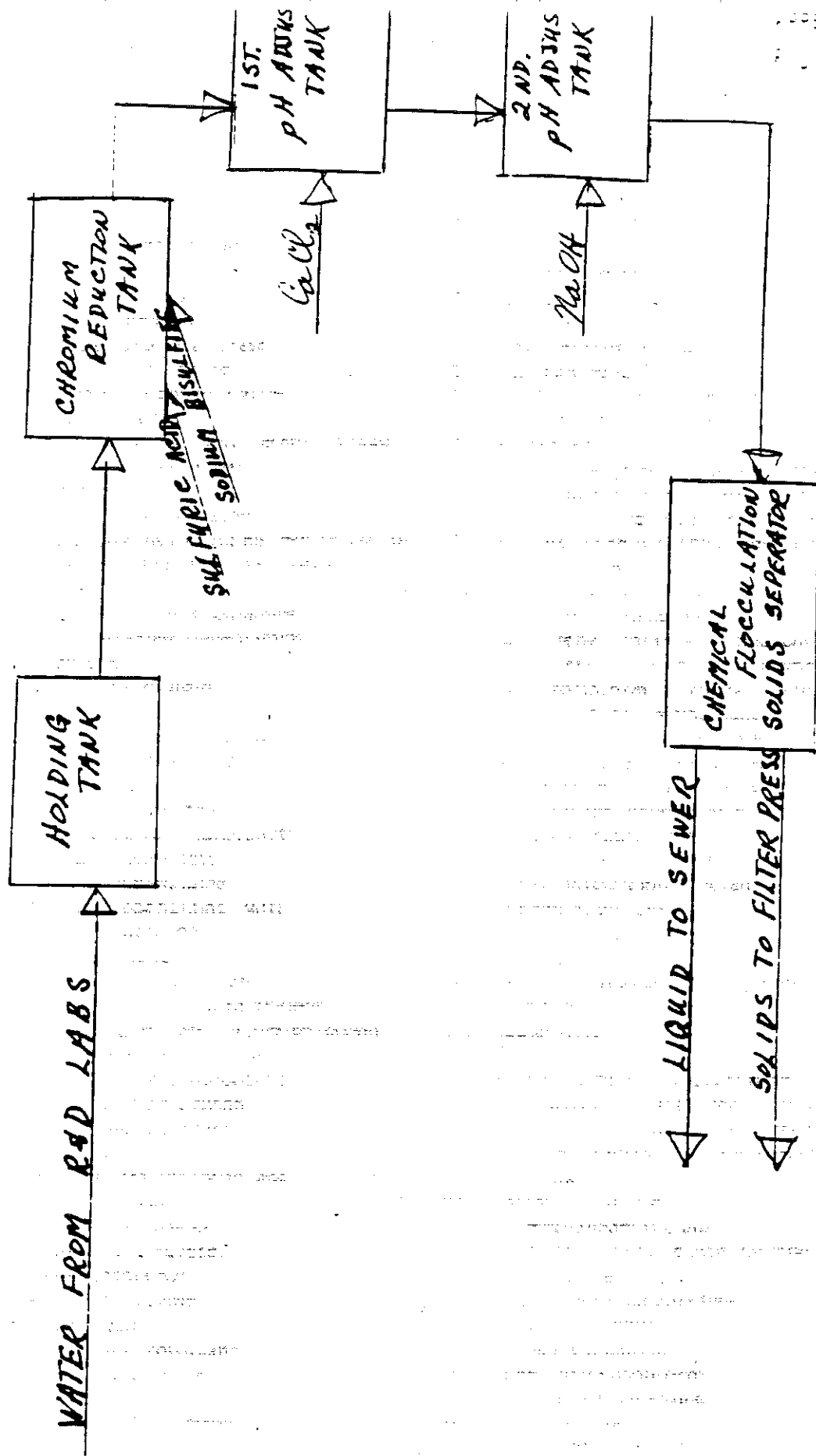
- Any employee(s) encountering an emergency situation will immediately alert key onsite personnel.
- If key personnel are not onsite, the switchboard operator (day shift) will be immediately notified and will alert key personnel.
- The operator (or designated supervisor during second shift) will call the appropriate personnel and notify them of any emergency event associated with the chemical storage area.

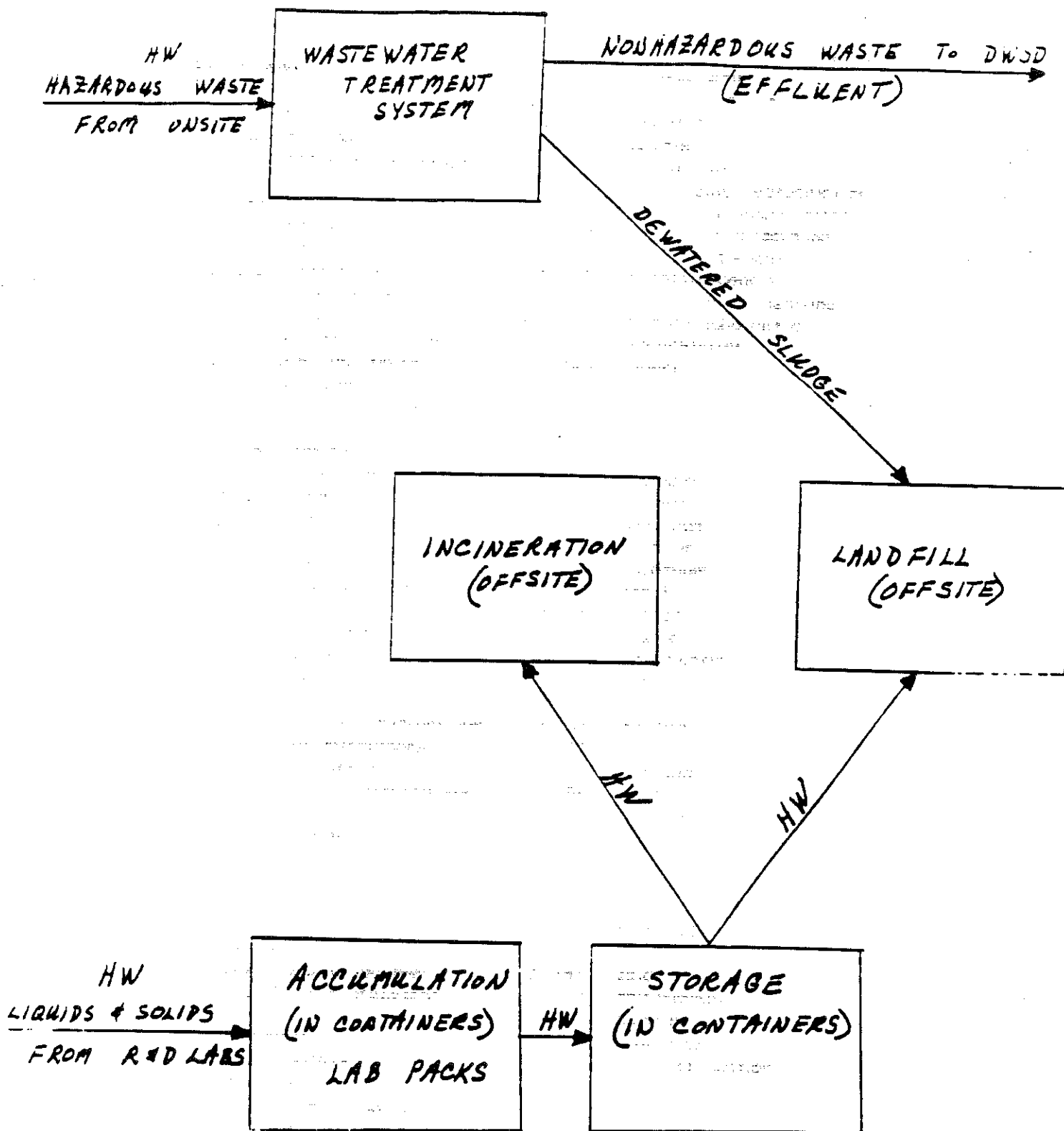
If the emergency event occurs during nights, evenings, weekends, or holidays when no facility personnel are present, the following occurs:

- In the event of a break-in, the security company notifies the police and key plant personnel.
- In the event of a fire, the sprinklers are set off, the security company then notifies the fire department and key plant personnel.

In the event of a spill in the bulk storage area, an alarm will alert the security company.

WASTEWATER TREATMENT SYSTEM





REPORT OF OIL, SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been issued which require that all owners, managers or operators of vessels, oil storage or on land facilities shall notify the Water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of events and conditions.

Date		Company Name	
Location of Loss (Be Specific)			
Nature of Loss		Amount	Name of Surface Water involved
Date Loss was Discovered		Type of Discharge	
Name of Department of Natural Resources Representative Contacted			
Telephone or Telegraphed by whom			Title
Cause of Loss (include Type of Equipment and Other Details)			
Nature of Loss (include Complete Description of Damage)			
Additional Comments (include Name of Contact, Plans for Prevention of Recurrence, etc.)			
Company Name			By Signature

Return this form to: Remedial Action Section
Ground Water Quality Division
Michigan Department of Natural Resources

Box 30028
Lansing, Mich. 48908
24 hr. Emergency Notification Number
517/373-7666

Key

▷ = chemical available on site.

E.P.A. PRIORITY POLLUTANTS and MICHIGAN CRITICAL MATERIALS LIST

ORGANICS

- | | |
|--|---|
| <p>▷ 1. acids</p> <p>2. acenaphthene</p> <p>3. acetone cyanohydrin</p> <p>4. 2-acetylaminofluorene</p> <p>5. acrolein</p> <p>6. acrylic acid</p> <p>7. acrylonitrile</p> <p>8. allyl chloride</p> <p>9. 2-aminonaphthraquinone</p> <p>10. aminoazobenzene</p> <p>11. o-aminazotoluene</p> <p>12. 4-aminobiphenyl</p> <p>13. 3-amino-9-ethylcarbazole</p> <p>14. 1-amino-2-methylantraquin</p> <p>15. aminotriazole (amitrole)</p> <p>▷ 16. aniline</p> <p>17. aniline hydrochloride</p> <p>18. o-anisidine</p> | <p>19. o-anisidine hydrochloride</p> <p>20. benz(a)anthracene</p> <p>▷ 21. benzene</p> <p>22. benzidine</p> <p>23. benzidine salts</p> <p>24. benzo(a)pyrene</p> <p>25. brucine</p> <p>▷ 26. carbon tetrachloride</p> <p>27. chlorinated benzenes</p> <p>27. a. chlorobenzene</p> <p>27. b. 1,2,4-trichlorobenzene</p> <p>27. c. 1,2-dichlorobenzene</p> <p>27. d. 1,3-dichlorobenzene</p> <p>27. e. 1,4-dichlorobenzene</p> <p>28. chlorinated dibenzofurans</p> <p>29. chlorinated dioxins</p> <p>30. chlorinated ethanes</p> <p>▷ 30. a. 1,1,1-trichloroethane</p> <p>30. b. 1,1-dichloroethane</p> <p>30. c. chloroethane</p> |
|--|---|

PESTICIDES

173. aldicarb
174. aldrin
175. 4-aminopyridine
176. anilazine
177. antimycin A
178. azinphos-ethyl
179. azinphos-methyl
180. barban
181. benodanil
182. benzoyl
183. bromoxynil
184. 2(p-tert-butylphenoxy)-isopropyl 2-chloroethyl sulfite
185. captafol
186. captan
187. carbaryl
188. carbofuran
189. carboxphenothion
190. chlordane
191. chlordecene
192. chlorfenvinphos
193. chlorobenzilate
194. chlorpyrifos
195. clofuralid
196. coumaphos
197. crotoxyphos
198. cycloheximide
199. DDT
200. demeton
201. diallate
202. diazinon
203. dibromochloropropane (DBCP)
204. dichloro
205. dichlorvos
206. dichrotophos
207. dieldrin
208. dimethoate
209. dinocap
210. dinoseb
211. disulfathion
212. disulfoton
213. endosulfan
214. endrin
215. EPN
216. ethan
217. fenitrothion
218. fenitron
219. fluchloralin
220. heptachlor
221. heptachlor epoxide
222. Isomers of hexachlorocyclohexane
222. a. α -HHC-Alpha
222. b. β -HHC-Beta
222. c. γ -HHC-Delta
223. leptophos
224. malathion
225. metabolites of DDT
225. a. 4,4'-DDT(p,p'-DDT)
225. b. 4,4'-DDT(p,p'-DDT)
226. metabolites of endosulfan
226. a. endosulfan sulfate
227. metabolites of endrin
227. a. endrin aldehyde
228. metabolites of heptachlor
228. a. heptachlor epoxide
229. methomyl
230. methoxychlor
231. methyl mercaptan
232. methyl parathion
233. mevinphos
234. mexacarbate
235. mirex
236. monocrotophos
237. naled
238. nicotine
239. nitrofen
240. oxydemeton-methyl
241. paraquat
242. parathion
243. phorate
244. phosazetm
245. phosmet
246. phosphamidon
247. rotenone
248. silvex, propylene glycolbutyl ether ester
249. sodium fluoroacetate
250. strychnine
251. sulfalate
252. sulfoxep
253. TDE
254. TEPP
255. terbufos
256. tetrachlorvinphos
257. thiram
258. toxaphene
259. trichlorfon
260. trichlorophenoxyacetic acid (2,4,5-T)
261. trifluralin
262. ziram

30. d. 1,1,2,2-tetrachloroethane
31. chlorinated naphthalene
31. a. 2-chloronaphthalene
32. chlorinated phenols
32. a. 2-chlorophenol
32. b. parachlorometa-cresol
32. c. 2,4-dichlorophenol
33. 1-chloro-2,3-epoxypropane
34. chloroalkyl ethers
34. a. 2-chloroethyl vinyl ether (mixed)
35. bis(2-chloroethyl)ether
- ▷ 36. Chloroform
37. bis(2-chloromethyl)ether
38. 3-(chloromethyl)pyridine hydrochloride
39. 1-(4-chlorophenyl)-3,3-dimethyl triazene
40. 4-chloro-m-phenylenediamine
41. 4-chloro-o-phenylenediamine
42. chloroprene
43. 5-chloro-o-toluidine
44. p-cresidine
45. 2,4-diaminoanisole sulfate
46. 4,4-diaminodiphenyl ether
47. 2,4-diaminotoluene
48. dibenz(a,h)anthracene
49. tris(dibromopropyl)phosphate
50. di-n-butyl phthalate
51. 3,3-dichlorobenzidine
52. 3,3-dichlorobenzidine salts
53. 1,2-dichloroethane
54. dichloroethylenes
54. a. 1,1-dichloroethylene
54. b. 1,2-trans-dichloroethylene
55. dichloropropane and dichloropropene
55. a. 1,3-dichloropropylene; (1,3-dichloropropene)
55. b. 1,2-dichloropropane
56. 1,2:3,4-diepoxybutane
57. diethyl sulfate
58. 4-dimethylaminoazobenzene
59. dimethylhydrazines
60. 2,4-dimethyl phenol
61. 4,6-dinitro-o-cresol
62. 2,4-dinitrophenol
63. 2,4-dinitrotoluene
64. dinitrotoluene
64. a. 2,6-dinitrotoluene
65. di-n-octyl phthalate
66. 1,4-dioxane
67. 2,3-epoxy-1-propanol
68. ethylbenzene
69. ethylene dibromide
70. ethylenimine
71. ethylene oxide
72. ethylene thiourea
73. bis(2-ethylhexyl)phthalate
74. ethylmethanesulfonate
75. fluoroanthene
76. 2-(2-formylhydrazino)-4-(5-nitro-2-furyl)thiazole
77. Haloethers
77. a. 4-chlorophenyl phenyl ether
77. b. 4-bromophenyl phenyl ether
77. c. bis(2-chloroisopropyl) ether
77. d. bis(2-chloroethoxy)methane
78. Halomethanes
- ▷ 78. a. methylene chloride; (dichloromethane)
78. b. methyl chloride; (chloromethane)
78. c. methyl bromide; (bromomethane)
78. d. bromoform; (tribromomethane)
78. e. dichlorobromomethane
78. f. trichlorofluoromethane
78. g. dichlorodifluoromethane
78. h. chlorodibromomethane
79. hexachlorobenzene (HCH)
80. hexachlorobutadiene
81. hexachlorocyclohexane
82. hexachlorocyclopentadiene
83. hexachloroethane
84. hydrazobenzene
85. hydroquinone
86. N-(2-hydroxyethyl)ethyleneimine
87. isophorone
88. lactonitrite
89. malachite green
90. methylenebis(2-chloroaniline)
91. 4,4-methylenebis(2-methylaniline)
92. 4,4-methylenbis(N,N-dimethylaniline)
93. 1,2(methylenedioxy)-4-propenyl benzene
94. methyl hydrazine
95. 1-methylmanththalene
96. 2-methyl-1-nitroanthraquinone
97. mustard gas
98. 1,5-naphthalenediamine
- ▷ 99. 1-naphthylamine
100. 2-naphthylamine
101. 5-nitroacenaphthene
102. 5-nitro-o-anisidine
- ▷ 103. nitrobenzene
104. 4-nitrobiphenyl

- 105. nitrogen mustard
- 106. 2-nitrophenol
- 107. 4-nitrophenol
- 108. Nitrosamines
- 108. a. N-nitrosodiphenylamine
- 108. b. N-nitrosodi-n-propylamine
- 109. N-nitroso-n-butyl-N-(4-hydroxybutyl) amine
- 110. N-nitrosodiethylamine
- 111. N-nitrosodimethylamine
- 112. p-nitrosodiphenylamine
- 113. N-nitroso-N-ethylurea
- 114. N-nitroso-N-methylurea
- 115. N-nitroso-N-methylurethane
- 116. N-nitrosomethylvinylamine
- 117. N-nitrosomorpholine
- 118. N-nitroso-N-phenylhydroxyl-amine, ammonium salt
- 119. N-nitrososarcosine
- 120. pentachloronitrobenzene
- 121. pentachlorophenol
- 122. peroxoacetic acid
- ▷ 123. phenol
- 124. Phthalate esters
- 124. a. butyl benzyl phthalate
- 124. b. diethyl phthalate
- 124. c. dimethyl phthalate
- 125. piperonyl sulfoxide
- 126. polychlorinated biphenyls (PCB)
- 127. polychlorinated biphenyls (PCH)
- 128. Polynuclear aromatic hydrocarbons
- 128. a. 3,4-benzofluoranthene
- 128. b. benzo(k) fluoranthene; (1,12-benzofluoranthene)
- 128. c. chrysene
- 128. d. acenaphthylene
- 128. e. anthracene
- 128. f. benzo(ghi)perylene; (1,12-benzoperylene)
- 128. g. fluorene
- 128. h. phenanthrene
- 128. i. indeno(1,2,3-cd)pyrene; (2,3-0-phenylene-pyrene)
- 128. j. pyrene
- 128. k. naphthalene
- 129. 1,3-propane sultone
- 130. R-propiolactone
- 131. 5-propyl-1,3-benzodioxole
- 132. propyleneimine
- 133. semicarbazide
- 134. styrene

- 135. tetrachloroethylene(perchloroethylene)
- 136. thioacetamide
- 137. 4,4-thiodianiline
- ▷ 138. thiourea
- ▷ 139. toluene
- ▷ 140. o-toluidine
- 141. o-toluidine hydrochloride
- 142. triaryl phosphate esters
- 143. 1,1,2-trichloroethane
- 144. trichloroethylene
- ▷ 145. trichlorophenols
- 146. 2,4,5-trimethylaniline
- 147. trimethylphosphate
- 148. vinylchloride
- ▷ 149. xylene

A. INORGANICS

- ▷ 150. antimony
- ▷ 151. arsenic
- 152. beryllium
- 153. cadmium
- ▷ 154. chromium
- ▷ 155. cobalt
- ▷ 156. copper
- ▷ 157. cyanides
- 158. hypochlorite
- 159. lead
- 160. lithium
- ▷ 161. mercury
- ▷ 162. nickel
- 163. selenium
- ▷ 164. silver
- 165. thallium
- ▷ 166. zinc

B. INORGANICS

- ▷ 167. acids
- 168. chloramines
- 169. chlorine
- 170. hydrazine
- 171. hydrogen sulfide

C. INORGANICS

- 172. asbestos (fibrous)

Appendix B

Fire Extinguishers

Three types are available. See attached floor plan for location.

Location

Emergency Oxygen

1. First Aid Room (D-73)
2. Maintenance Office
3. Second Floor, Xerox Room
4. New Lab Area, West Hall

Fire Hydrants

1. Front of Facility (West side) at main lobby entrance.
2. Southwest of Facility, across side street (Whitcomb).
3. Northwest of Facility, near parking lot.

Spill Control Equipment

1. Neutralization - Soda Ash (TD 1500 - 0)

Quantity

100 lb.

Location

Applications Lab.

2. Oil Absorbent

Quantity

75 lbs., Spill Tamer
1 case Sorbent Pillows
1 case Sorbent Pads
200 lbs. Zorb-All

Location

Technical Stockroom
Maintenance Stockroom
Maintenance Stockroom
Maintenance Area

3. Containers

Quantity

Steel, open head
Steel, closed head
with poly liner

Size

55 gal.
55 gal.

Location

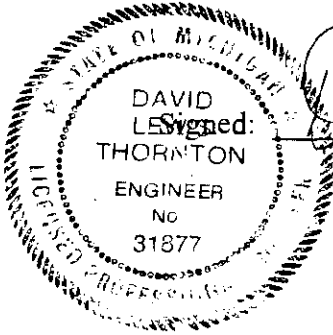
Shop Area or Stockroom
Shop Area or Stockroom

Communications

Alarm: Main lobby, switchboard activated.
Phones: All laboratory and office areas.
ADT: Fire pull boxes - throughout building in halls.

Statement of Approval by Registered Professional Engineer:

"I have examined this facility and am familiar with the provisions of Title 40, Code of Federal Regulations 112, and attest that the Spill Prevention Control and Countermeasure Plan for this facility has been prepared in accordance with good engineering practice."



Signed: David L. Thornton PE
David L. Thornton, P.E.

Date: 3/18/99

Michigan Registration Number: 31877

Facility Manager: Thomas M. Snell
Thomas M. Snell

Date: 3/18/99

Date of Next Mandatory Review: 3/18/02
(Every three years)

FINDING NUMBER NINE (9)

- COPY OF RECYCLING PROGRAM DOCUMENTATION
- ANALYTICAL DATA FOR THE PAINT FILTERS



THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE • WAYNE, MICHIGAN 48184 • tel 734 329-8000 • fax 734 329-8140 • www.eqonline.com

* **Recycling:** Following are several different pricing options for the recycling of universal wastes. EQ can provide personnel to sort and package materials as requested by Henkel. Pricing is outlined for lamps, batteries, office paper, cardboard and scrap steel. EQ can also provide recycling for computer monitors, mercury electrical equipment and PCB ballast/materials if required. Pricing is provided for common types of lamps and batteries although we can manage many types of materials and further pricing can be provided upon request. Transportation pricing for the lamps and batteries is noted above via tractor-trailer or barrel truck.

* *Recycling of Lamps*

Fluorescent 4' and compacts	\$0.32/lamp
Fluorescent 5' and greater	\$0.50/lamp
Fluorescent Tube Option	\$0.09/foot

* *Batteries*

Alkaline AAA through D	\$0.89/pound
Nickel Cadmium	\$1.12/pound
Lead Acid (Dry)	\$0.55/pound

Office Paper & Cardboard:

Option A: EQ will provide one 8-yard box to be placed on site for the collection of office paper and cardboard. The box will be emptied once per week or as requested by Henkel. Pricing includes the recycling box, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

Eight-Yard Box	\$120.00/month/box
----------------	--------------------

Option B:

EQ will provide 90-gallon recycling bins to be placed throughout specified office areas. The bins will be emptied as requested by Henkel. Pricing includes the recycling bins, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

Recycling Bins	\$65.00/month
----------------	---------------

Scrap Steel: A 10-12 Yard Box will be placed on site for the collection of scrap metal. The box will be switched out once per month or as frequently as requested. The monthly pricing includes rental and transportation. EQ will credit your account for the recycling of the scrap metal. The credited amount may vary as the market fluctuates within the scrap metal industry.

Monthly Fee	\$125.00/month/box
-------------	--------------------



THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE WAYNE, MICHIGAN 48184 • tel 734 329-8000 • fax 734 329-8140 • www.eqonline.com

Emergency Response: EQ can provide 24 hour emergency response at your Madison Heights Facility. EQ's emergency response team has the ability to handle your emergency spill from start to finish. A detailed brochure is attached for your information.

Industrial Cleaning: EQ Industrial Services can provide virtually all of your industrial cleaning needs. Pricing can be quoted upon your request.

Training: EQ can provide on-site training for Henkel personnel. We provide OSHA refresher courses along with RCRA 2-hour refresher courses. Pricing can be quoted upon request.

Materials: EQ can provide all necessary materials to handle your waste management needs.

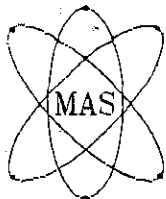
55-Gallon Steel Drums	\$35.00/drum
Open or closed top	
One Yard Boxes	\$85.00/box
Boxes for Lamp Shipment	\$6.60/box
(4' or 8')	

Labpacks: Labpacks will be scheduled once every six weeks or as requested by Henkel. See Attachment A for pricing.

If you have any questions regarding the above scope of work, feel free to give me a call at anytime. Once again, thank you for choosing EQ and related companies for your environmental management solutions.

Sincerely,

Jennifer LaPeer Chopp
Resource Manager
734-547-1005



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology

2727 Second Avenue

Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date : 28-Dec-99

Client : MOLLY DWINNELLS
: DYNECOL, INC.

Mas# : 91222018

PROJECT: : HENKEL SURFACE TECHNOLOGIES

Sample I.D. : 107385.6 PAINT BOOTH FILTERS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

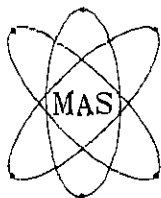
1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.
2. N/D=Not detected.
3. Results relate only to the items tested.
4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
5. QC information on file.
6. EQL=Estimated Quantitation Limit.
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Norman Brooks
Customer Service Quality Manager ext. 130



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

:(313) 964-3680

Fax No: (313) 964-2339

IN: CDH

TEST REPORT

MAS #:91222018

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 28-Dec-99

P.O. #: 115-4947

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 107385.6 PAINT BOOTH FILTERS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 22-Dec-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	RQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IONITABILITY	> 200	°F	---	< 140 D001	RA	12/23/99	
SW-846 9045C	*pH / CORROSIVITY	6.78	UNITS	---	<2 : >12.9 D002	NW	12/23/99	
SW-846 7.3.3.2	REACTIVITY:							
40 CFR	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	NW	12/27/99	
261.23.5	REACTIVE SULFIDE	NEGATIVE	---	---	D003	NW	12/27/99	
SW-846 9828SM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	HL	12/27/99	
SW-846 8882	PCB:		mg/kg		---	DGB	12/24/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCDF METALS (1311):		mg/l			MV	12/27/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6018A	BARIUM	N/D		10	100 D005			
6018A	CADMIUM	N/D		0.50	1.0 D006			
6018A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6810A	SILVER	N/D		1.0	5.0 D011			
SW-846 8260B	TCDF VOLATILES (1311):		mg/l			DGB	12/27/99	
	BENZENE	N/D		0.50	0.5 D018			
	CARBON TETRACHLORIDE	N/D		0.50	0.5 D019			
	CHLOROBENZENE	N/D		0.50	100 D021			
	CHLOROFORM	N/D		0.50	6.0 D022			
	1,2-DICHLOROETHANE	N/D		0.50	0.5 D028			
	1,1-DICHLOROETHYLENE	N/D		0.50	0.7 D029			
	METHYL ETHYL KETONE	N/D		10	200 D035			
	TETRACHLOROETHYLENE	N/D		0.50	0.7 D039			
	TRICHLOROETHYLENE	N/D		0.50	0.5 D040			
	VINYL CHLORIDE	N/D		0.20	0.2 D043			
SW-846 8270B	TCDF SEMI-VOLATILES (1311):		mg/l			DDB	12/23/99	SL
	1,4-DICHLOROBENZENE	N/D		2.0	7.5 D027			LH
	2,4-DINITROTOLUENE	N/D		0.13	0.13 D030			
	HEXACHLOROBENZENE	N/D		0.13	0.13 D032			
	HEXACHLOROBUTADIENE	N/D		0.13	0.5 D033			LH
	HEXACHLOROETHANE	N/D		2.0	3.0 D034			LH
	NITROBENZENE	N/D		2.0	2.0 D035			
	PYRIDINE	N/D		2.0	5.0 D038			
	TOTAL CRESOL	N/D		10	200 D026			
	PENTACHLOROPHENOL	N/D		3.0	100 D037			
	2,4,5-TRICHLOROPHENOL	N/D		2.0	400 D041			
	2,4,6-TRICHLOROPHENOL	N/D		2.0	2.0 D042			

*SAMPLE pH MEASURED IN WATER AT 20°C.

SL Surrogate spike indicates low recovery.

LH QC indicates low recovery for this analyte.

Norman Brooks

Norman Brooks
Customer Service Quality Manager ext 130



WASTE CHARACTERIZATION DATA CHANGE FORM BFI VERSION

IMPORTANT: THIS FORM IS TO BE COMPLETED AND SIGNED BY A BFI REPRESENTATIVE WHO HAS HAD PERSONAL CONTACT WITH THE GENERATOR'S REPRESENTATIVE. THIS FORM CANNOT BE USED FOR CHANGES TO THE FOLLOWING: Special Waste WCD sections 2(a), (b), (c), and (d); 7 and 9; Petroleum Soils WCD sections 2(a), (c), (e); 4; and 6. THIS FORM MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK.

1. GENERATOR INFORMATION

a) Generator's Name: PARKER AMCHEM d) Original WCD Number: AB 55796
 b) Generating Facility Address: 32100 STEPHENSON BFI Laboratory Number 228815
 City MADISON HILLS State MI Zip 48071 e) Company Representative Contacted:
 c) Description of the Waste: Name: RANDY CLEMENT
NON-HAZARDOUS FILTER Title: FACILITY MANAGER
PRESS SLUDGE Date 2-15-95 Time _____ Tel No. (810) 583-9300
 Fax No. () _____

2. AMENDMENTS

The following changes are to be noted for the above referenced Waste Characterization Data form:

- a) Section: A ☒ Addition ☐ Deletion ☐ Change
 Describe: NON-HAZARDOUS FILTER PRESS SLUDGE
- b) Section: B ☒ Addition ☐ Deletion ☐ Change
 X Describe: Wastewater from R&D labs is treated in system (see attached)
Laboratories discharge water soluble cleaners and treatment chemicals
Containing acids/alkalis, Chromates/phosphates
- c) Section: 6 ☒ Addition ☐ Deletion ☐ Change
 X Describe: Filter cake solids 20-25% + Water 75-80% = 100%
Filter cake solids contains: PO₄ 20-50%, Ca 20-30%, Zn 2-10%
Fe 1-4%, Cr 0.5-1%, Ni 0.2-2%
- d) Section: _____ ☐ Addition ☐ Deletion ☐ Change
 Describe: _____

3. BFI CERTIFICATION

I hereby certify that I made personal contact with the generator or authorized generator representative identified above, on the date and time and at the telephone number shown above, and that all amendments shown above are complete and accurate summarizations of my conversations with the generator or generator's authorized representative. I further certify that there are no deliberate or willful omissions of misrepresentations on my part contained in the above amendments.

X DATE _____ PRINT NAME _____ SIGNATURE _____

BFI Initiator: CLAUDIA BURCH Location _____
 Company Number: 687 Date: 2-15-95 Telephone _____



Recycled paper

Claudia J. Burch
 Landfill Sales Representative
 Michigan Landfills

BROWNING-FERRIS INDUSTRIES
 10690 Six Mile Road
 Northville, Michigan 48187

(810) 347-9888
 Fax (810) 347-9899



BROWNING-FERRIS INDUSTRIES

WCD No. AB

55796

BFI WASTE CODE

WASTE APPROVAL REQUEST

BFI to complete this area

BFI Initiator: CLAUDIA BURCH
Location: AK
Company Number: 687
Telephone: (810) 347-9888
Fax: (810) 347-9899
Date: 1-31-95

Action Requested: ☒ New Waste Approval
☐ Up-Date Approval - Previous Number: _____
Disposal Site Requested: AK
Company Number: 687
Management Method Requested: ☒ Landfill ☐ Hauling
☐ Other _____

COUNTY: OAKLANDWASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: PARKER AMCHAM
b) Generating Facility's Address: 32100 STEPHENSON
City: MADISON WTS State: MI Zip: 48071
c) Generator's Representative: RAWY CLEMENT
Title: FACILITY MANAGER
Telephone: (810) 583 9300
Fax: (810) 582-4825
d) Emergency/Information Contact: J GARNWANT
Title: REG. AFFAIRS DIR.
Telephone: (810) 583 9300

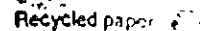
e) State/Provincial/Local Registration No.: _____
Generator's EPA Id. No.: _____
Industry Description/SIC Code: _____
f) Customer's Name: SAME
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: NON-HAZARDOUS FILTER PRESS SLUDGE
b) Process Generating Waste: LABORATORY WASTE STREAMS, METAL CLEANERS
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment: _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☐ Yes ☒ No If yes, enter Waste Identification Number: _____
f) Recommended personal protection equipment and special handling procedures: AS REQUIRED
g) Anticipated Volume: 60 ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☒ Year ☐ Month ☐ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s): GRAY
Describe _____
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong
e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1 - 5.0 ☒ 5.1 - 9.0
☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ☐ N/D





12610 Newburgh Road
Livonia, Michigan 48150
(313) 591-1855, Fax (313) 591-3331

ANALYTICAL REPORT

October 23, 1998

Henkel Corporation
32100 Stephenson Highway
Madison Hgts., MI 48071

MEI Report Number: 5109
MEI Sample Number: 015649

Project Name: n/a
Project Number: n/a

Date Submitted: 10/05/98
Purchase Order: P102183

Sample Description: Filter Press Sludge
Collection Date: 09/30/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
10 MDNR METALS by TCLP						
Arsenic	<0.100	ppm	0.100	7060	10/13/98	MLC
Barium	<20.00	ppm	20.00	7080	10/13/98	MLC
Cadmium	<0.100	ppm	0.100	7130	10/13/98	MLC
Chromium	<2.00	ppm	1.00	7190	10/13/98	MLC
Copper	<2.50	ppm	2.50	7210	10/13/98	MLC
Lead	<1.00	ppm	1.00	7420	10/13/98	MLC
Mercury	<0.050	ppm	0.200	7470	10/13/98	MLC
Selenium	<0.500	ppm	0.500	7740	10/13/98	MLC
Silver	<0.500	ppm	0.500	7760	10/13/98	MLC
Zinc	<2.00	ppm	2.00	7950	10/13/98	MLC
RCRA CHARACTERISTICS ANALYSIS						
Ignitibility	>140° F	Deg. F	n/a	1010	10/09/98	MLC
Corrositivity pH Units	8.0	S. U.	n/a	9045	10/09/98	MLC
As Cyanide	ND	mg/L	0.01	9010	10/09/98	MLC
As Sulfide	13.4	mg/L	0.01	9030	10/09/98	MLC
TCLP SEMI - VOLATILES FRACTION						
Hexachlorobenzene	ND	mg/L	0.10	8270	10/22/98	JDM
2,4-Dinitrotoluene	ND	mg/L	0.10	8270	10/22/98	JDM
Hexachlorobutadiene	ND	mg/L	0.10	8270	10/22/98	JDM
Nitrobenzene	ND	mg/L	0.10	8270	10/22/98	JDM
2,4,6-Trichlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM
Hexachloroethane	ND	mg/L	0.10	8270	10/22/98	JDM
Pyridine	ND	mg/L	0.10	8270	10/22/98	JDM
Pentachlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM
o-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
m-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
p-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
4,5-Trichlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM



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ANALYTICAL REPORT

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MEI Report Number: 5109
MEI Sample Number: 015649

Project Name: n/a
Project Number: n/a

Date Submitted: 10/05/98
Purchase Order: P102183

Sample Description: Filter Press Sludge
Collection Date: 09/30/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
TCLP VOLATILE FRACTION						
Vinyl chloride	ND	mg/L	0.025	8240	10/22/98	JDM
zene	ND	mg/L	0.025	8240	10/22/98	JDM
Carbon tetrachloride	ND	mg/L	0.025	8240	10/22/98	JDM
1,2-Dichloroethane	ND	mg/L	0.025	8240	10/22/98	JDM
Trichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
1,1-Dichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
Tetrachloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
Chloroform	ND	mg/L	0.025	8240	10/22/98	JDM
1,4-Dichlorobenzene	ND	mg/L	0.025	8240	10/22/98	JDM
Chlorobenzene	ND	mg/L	0.025	8240	10/22/98	JDM
Methyl ethyl ketone	ND	mg/L	0.025	8240	10/22/98	JDM
TCLP Pesticides						
Chlordane	ND	ppm	0.040	8080	10/22/98	MH
Endrin	ND	ppm	0.004	8080	10/22/98	MH
Heptachlor	ND	ppm	0.004	8080	10/22/98	MH
Heptachlor epoxide	ND	ppm	0.004	8080	10/22/98	MH
Lindane	ND	ppm	0.004	8080	10/22/98	MH
Methoxychlor	ND	ppm	0.004	8080	10/22/98	MH
Toxaphene	ND	ppm	0.040	8080	10/22/98	MH
TCLP Herbicides						
2,4-D	ND	ppm	0.05	8150	10/22/98	SAM
2,4,5-TP	ND	ppm	0.05	8150	10/22/98	SAM

Reviewed By: 

HAZARDOUS WASTE INSPECTION

RCRIS

DEC

Date: 9-21-99 ID#: MID 057676 124
Facility's Name: Henkel / ~~Chlorine~~ Surface Technologies just snap 1991
Facility Location Address: _____
City: _____ Zip: _____ County Name: _____

WASTE CODE	PROCESS WASTE IS GENERATED FROM
	Filter Cake
	Phosphates

Reason for the Inspection: _____ Routine _____ Follow-up _____ Complaint

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER

INSPECTOR(S) NAME	AGENCY	TELEPHONE NUMBER

Thomas Snell
Primary business of the facility: no longer have container storage shed
George Bayer on vacation, Tech. Serv. Mgr.
Tom Snell

James M. Landis
During 1 Quarter went over RCRA reg's.

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated hazardous waste? _____ no ☒ yes
(if yes send a copy of this cover sheet to SWQD)

Bob
Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of

eration(s): distillation fractionation thin-film evaporation solvent extraction air or stream stripping (if yes send a copy of this cover sheet to AQD)

(rev. 11/16/95 - EAB - zcover.new)

Mark - will send your waste & lamp handout.

Based upon the inspection this facility was inspected as a:

check forms used	GENERAL CATEGORIES OF FACILITIES
	conditionally exempt small quantity generator
	small quantity generator
	small quantity generator tank system
✓	generator
	generator tank system
	transporter
	boiler and/or industrial furnace
	wood preserver
	small quantity handler
	large quantity handler

check forms used	PERMITTED OR INTERIM TREATMENT, STORAGE, DISPOSAL FACILITIES
	permitted general treatment, storage or disposal facility
	interim general treatment, storage or disposal facility
	generator (appendix)
	tank system
	permitted surface impoundment
	permitted waste pile
	permitted land treatment
	permitted landfill
	miscellaneous units
	permitted organic air emissions from process vents
	permitted organic air emissions from equipment leaks
	interim groundwater monitoring (use with Subparts K, L, M & N)
	interim surface impoundment
	interim waste pile
	interim land treatment
	interim landfill
	interim chemical, physical & biological treatment
	interim organic air emissions from process vents
	permitted organic air emissions from equipment leaks

Mark gave copy of Gen Form & asked to resubmit.

MANIFEST REVIEW LOG

FACILITY NAME _____ DATE _____

ID NUMBER _____

MANIFEST NUMBER	G2	LB	DATE	WASTE CODES	QUANTITY
3/1/99 (Shipped 4/99)					
D002	309		D001	309	N2/3 55g
	20			SS	1044 309
400P	5			20	
280	5				
	20				
	80				
	60				
D003	5g				
	5g				
P106	5g				

notes:

G2 - Generator 2nd copy
LB - land ban

GENERATOR INSPECTION FORM

Facility's Name _____

Part 3 Rules

Date _____ ID# _____

1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH

(rev. 01/29/97 - EAB)

_____ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable

YES NO NI N/A

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	GGR	<input checked="" type="checkbox"/> NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)) <i>only F. kr Press Sledge</i>	GRR	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3)) <i>Co. Said</i>	GGR	<input checked="" type="checkbox"/> NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/> NI N/A
---	-----	--

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

3. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/> NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GMR	<input checked="" type="checkbox"/> NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	NI N/A
a) Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/> NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/> NI N/A
6. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/> NI N/A
7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/> NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).

8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)		
a) Number of manifests generator <u>HASN'T</u> receive signed copy from TSD w/in 35 days.	GRR	N/A
b) Manifests generator <u>HASN'T</u> submitted exception reports to RA & DEQ after 45 days.	GRR	N/A

		YES	NO	NI	N/A
10. Facility have written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(I):40 CFR 262.20(a))	GMR	<input type="checkbox"/>		NI	N/A

OR

11. Facility discuss program in place to reduce volume/toxicity/recycle of wastes? (Rule 304(2)(I): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/>		NI	N/A
---	-----	-------------------------------------	--	----	-----

WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)

12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a))					
a) All listed wastes?	GLB	<input checked="" type="checkbox"/>		NI	N/A
b) All characteristic wastes?	GLB	<input checked="" type="checkbox"/>		NI	N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ each shipment? (40 CFR 268.7(a)(1))	GLB	<input type="checkbox"/>		NI	N/A
--	-----	--------------------------	--	----	-----

OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with each shipment? (40 CFR 268.7(a)(2))	GLB	<input type="checkbox"/>		NI	N/A
--	-----	--------------------------	--	----	-----

OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with each shipment? (40 CFR 268.7(a)(3))	GLB	<input type="checkbox"/>		NI	N/A
--	-----	--------------------------	--	----	-----

OR

16. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go w/ each shipment? (40 CFR 268.7(a)(8))	GLB	<input type="checkbox"/>		NI	N/A
17. Did the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(I)(A-D) or 268.7(a)(3)(I-iv)					
a) EPA hazardous waste #?	GLB	<input type="checkbox"/>		NI	N/A
b) If wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	<input type="checkbox"/>		NI	N/A
c) Subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	<input type="checkbox"/>		NI	N/A
d) Manifest number associated with the shipment?	GLB	<input type="checkbox"/>		NI	N/A
e) Waste analysis data, where available?	GLB	<input type="checkbox"/>		NI	N/A
f) Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	GLB	<input type="checkbox"/>		NI	N/A

UNLESS

g) Did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii))	GLB	<input type="checkbox"/>		NI	N/A
h) Underlying hazardous waste constituents (except vanadium and zinc), reasonably be expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	GLB	<input type="checkbox"/>		NI	N/A
18. Other than notices for waste exceeding treatment standards, did notices include:					
a) If the notice is for shipments that meet the standards does the notice include the certification?	GLB	<input checked="" type="checkbox"/>		NI	N/A
b) If the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	GLB	<input checked="" type="checkbox"/>		NI	N/A

mg & char. of paint filters & light bulbs

YES NO NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

19. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(5))	GLB	<input checked="" type="checkbox"/> NI N/A
20. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a on-time notice stating same in the facility file? (40 CFR 268.7(a)(6))	GLB	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
21. All notices/certifications/demonstrations/other documents retained for 5 years on-site? (40 CFR 268.7(a)(7))	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3)

22. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR 268.3(a))	GLB	<input checked="" type="checkbox"/> NI N/A
--	-----	--

TREATMENT STANDARDS (40 CFR 268.40)

23. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	GLB	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
--	-----	---

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

24. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<input checked="" type="checkbox"/> NI N/A
25. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR	<input checked="" type="checkbox"/> NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

26. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	GPT	co. said <input checked="" type="checkbox"/> observed <input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	co. said <input type="checkbox"/> observed <input type="checkbox"/> <input type="checkbox"/> NI N/A
28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	co. said <input type="checkbox"/> observed <input type="checkbox"/> <input type="checkbox"/> NI N/A
29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input type="checkbox"/> NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

30. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input type="checkbox"/> NI N/A
c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
d) Has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input type="checkbox"/> NI N/A

UNLESS

e) The generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
--	-----	---

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) Are containers in good condition? (265.171)	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
g) Are containers compatible with waste in them (265.172)	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
h) Are containers stored closed? (265.173(a))	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

1 Part open (oil) w/ no label

- difficult to view containers

155 g
Drum with waste codes

Pallets broken

		YES	NO	NI	N/A
Containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GMC			NI	N/A
Ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GMC			NI	N/A
Are containers inspected weekly for leaks and defects? (265.174)	GMC			NI	N/A
Did the generator document the inspections in 30(k)? (Rule 306(1)(a)(I))	GMC			NI	N/A
Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(I))	GMC			NI	N/A
Are incompatible wastes stored in separate containers? (265.177(a))	GMC			NI	N/A
Hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GMC			NI	N/A
Incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GMC			NI	N/A
31. If hazardous waste is being accumulated at the point of generation:					
Container(s) < 55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC			NI	N/A
Container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC			NI	N/A
Container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GMC			NI	N/A
Are the container(s) marked with the hazardous waste number? (Rule 306(2))	GMC			NI	N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

Are container(s) in good condition? (265.171)	GMC			NI	N/A
Are container(s) compatible with waste in them? (265.172)	GMC			NI	N/A
Container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GMC			NI	N/A
32. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste? (Rule 306(2): 40 CFR 262.34(c)(2))					
Mark the container with the date the excess amount began accumulating?	GMC			NI	N/A
Move to an area with secondary containment?	GMC			NI	N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

33. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include: N/A					
Impervious base free of cracks? (264.175(b)(1))	GMC			NI	N/A
Sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GMC			NI	N/A
Hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GMC			NI	N/A
Run-on prevented unless sufficient capacity? (264.175(b)(4))	GMC			NI	N/A
Accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GMC			NI	N/A
33.4. If accumulating solids (other than F020, F021, F022, F023, F026, F027), is hazardous waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	GMC			NI	N/A

Closure of accumulation area(s) is under question 50.

33.5. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer.		NI	N/A
33.6. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GMC		NI N/A
33.7. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, groundwaters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	GMC		NI N/A
33.8. Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.		NI	N/A
33.9. Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form.		NI	N/A

YES NO NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

40. Do personnel training records contain the following: <i>personnel file, maintenance</i>			
a) Job title? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
b) Job descriptions? (265.16(d)(2))	GPT	<input type="checkbox"/>	NI N/A
c) Name of employee filling each job? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
d) Description of type & amount of both introductory & continued training? 265.16(d)(3)	GPT	<input checked="" type="checkbox"/>	NI N/A
e) Training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
f) Records of training? (265.16(d)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
g) Do new personnel receive required training within 6 months? (265.16(b)) <i>New Employee Orientation Program</i>	GPT	<input checked="" type="checkbox"/>	NI N/A
h) Do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
i) Training by person trained in haz. waste management procedures? (265.16(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

41. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	<input type="checkbox"/>	co. said <input checked="" type="checkbox"/> observed <input type="checkbox"/>	NI N/A
42. If required, does this facility have the following equipment:				
a) Internal communications or alarm systems? (265.32(a))	GPT	<input checked="" type="checkbox"/>		NI N/A
b) Telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input checked="" type="checkbox"/>		NI N/A
c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input checked="" type="checkbox"/>		NI N/A
d) Adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input checked="" type="checkbox"/>		NI N/A
43. Testing and Maintenance of Emergency Equipment:				
a) Owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input checked="" type="checkbox"/>		NI N/A

NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265.32

b) Has owner/operator provided immediate access to internal alarms? (265.34(a)&(b))				
i) When hazardous waste is being poured, mixed, etc.	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
ii) One employee on the premises while facility is operating.	GPT	<input checked="" type="checkbox"/>		NI N/A
c) Aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
d) Has the facility made arrangements with local authorities? (265.37(a)&(b)) <i>see 48b</i>	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)*updated every 3yrs
3/18/09 Mar*

45. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input checked="" type="checkbox"/>		NI N/A
46. Does the contingency plan contain the following information:				
a) Actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a)&(b))	GPT	<input checked="" type="checkbox"/>		NI N/A
b) Describe arrangements or attempts w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
c) Name, addresses & phone (office & home) of emergency coordinator? (265.52(d))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A

Generator Inspection Form

		YES	NO	NI	N/A
d) List emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>		NI	N/A
e) Evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input checked="" type="checkbox"/>		NI	N/A
47. Emergency Coordinator and Emergency Procedures:					
a) Coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input checked="" type="checkbox"/>		NI	N/A
b) Emergency coordinator have authority to carry out the contingency plan? (265.55)	GPT	<input checked="" type="checkbox"/>		NI	N/A
c) If emergency occurred, did coordinator followed emergency procedures? (265.56)	GPT	<input type="checkbox"/>		NI	N/A
d) Fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>		NI	N/A
48. Contingency plan Amendments and Copies:					
a) Amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input checked="" type="checkbox"/>		NI	N/A
b) Copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input type="checkbox"/>	X	NI	N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

Has the facility imported or exported hazardous waste?	GOR		NI	N/A
a) Exporting, has the generator:	GOR		NI	N/A
i) Notified the Administrator in writing? (262.52(a))	GOR	<input type="checkbox"/>	NI	N/A
ii) Receiving country consented to accept waste. (262.52(b))	GOR	<input type="checkbox"/>	NI	N/A
iii) Has copy of EPA Acknowledgment of Consent. (262.52(c))	GOR	<input type="checkbox"/>	NI	N/A
iv) Compiled with manifest requirements Rule in 309(2)(a-i).	GOR	<input type="checkbox"/>	NI	N/A
v) If required, was an exception report filled. (309(3)(a-c))	GOR	<input type="checkbox"/>	NI	N/A
b) Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GOR	<input type="checkbox"/>	NI	N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114.

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

50. The accumulation area must be closed in a manner that: (265.111 & 265.114)				
a) Minimizes need for further maintenance.	GMC	<input type="checkbox"/>	NI	N/A
b) Controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air.	GMC	<input type="checkbox"/>	NI	N/A
c) All contaminated equipment, structures, and soil properly disposed of.	GMC	<input type="checkbox"/>	NI	N/A

Comments:

Documentation of Univ. Waste Re. Laboratory

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
JORDON E. GUYER
KERRY KAMMER
ELLWOOD A. MATTSO
O. STEWART MYERS
RAYMOND POUPORE

John Engler, Governor
DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN DISTRICT HEADQUARTERS
Waste Management Division
38980 Seven Mile Road
Livonia, MI 48152

March 7, 1991



Mr. George J. Beyer
Technical Manager, Analytical and Support
Henkel Corporation - Parker+Amchem
32100 Stephenson Highway
Madison Heights, Michigan 48071

RE: MID 057676124

Dear Mr. Beyer,

On February 20, 1991 an inspection was conducted at your facility located at 32100 Stephenson Highway, Madison Heights, Michigan. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 P.A. 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

1. You have not inspected the storage facility since November of 1990 contrary to requirement of weekly and daily inspection as required under 40 CFR 265.15(a).
2. Two employees Shawn Dolan and Jim Wenzel have not been trained as required under 40 CFR 265.16(b) and 265.16(c). Please go through your record and have those people in your facility that come in contact with hazardous waste trained and document such training. Make sure such trainings are made available to the coordinators.
3. According to Mr. Jack Garavanta, the emergency coordinator has changed and your emergency contingency plan has not reflected that change as required 40 CFR 265.54.



Mr. George J. Beyer
Henkel Corporation - Parker+Amchem
Page 2 of 2, 3-4-91.

4. One drum of waste paint sludge and mineral spirit dating from December 1990 was neither labelled nor marked clearly with the words "Hazardous Waste" as required under R. 299.9614(1)(b) and the same container has not been inspected since November 1990 as required under 265.174.
5. The satellite accumulation in your paint room was missing the following:
 - (i) The drums were not marked with the hazardous waste number. (Rule 302(2)).
 - (ii) The drums were not stored open while not in use. (265.173(a)).
 - (iii) You exceeded the 55-gallon-limit and did mark the drums with date the excess amount started accumulating. This drum should be moved to your storage area. (262.34(c)(2))

We request your response by April 2, 1991 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 953-0241.

Sincerely,



Donald Mbamah
Environmental Quality Analyst.

DM/dm
Enclosure
cc: B. Okwumabua
U.S. EPA, Region V

RCRA/ACT 64 INSPECTION REPORT

I.D. Number (U.S. EPA or Michigan) M 10057676124

FACILITY NAME PARKER ~~CHEMICAL~~ AMCHEM HENKEL CORP.
 Mailing Address 32100 STEPHENSON HIGHWAY
MADISON HEIGHTS Michigan 48071
 City Zip Code

DATE 2/20/91 TIME (from) 10:00 AM (to) 1:30 PM

PERSON(S) INTERVIEWED	TITLE	TELEPHONE #
George Beyer	Technical Mgr	
Jack Cravanta		

INSPECTOR(S)	AGENCY	TELEPHONE #
Donald Mbama	MDNR	313 253 0241

Primary Business of this Facility: Research & Development of metal finishing chemicals

Reason for Inspection: (Under closure (Not yet closed))

☒ Routine ☐ Follow-up ☐ Complaint

RCRA/Act 64 Inspection Report

Based upon the inspection, this facility:

FORM

_____ is a non-generator
 _____ conditionally exempt small quantity generator
 _____ small quantity generator inspection form - - - - -A
 _____ generator inspection form B
 _____ tank(s) system inspection form - - - - -B1
 _____ transporter inspection form C

PERMITTED TSDF

_____ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D
 _____ generator appendix inspection form D1
 _____ tank system storage inspection form (Subpart J) - - - - -D2
 _____ surface impoundments inspection form (Subpart K) D3
 _____ waste piles inspection form (Subpart L) - - - - -D4
 _____ land treatment inspection form (Subpart M) D5
 _____ landfill inspection form (Subpart N) - - - - -D6
 _____ incineration inspection form (Subpart O) D7
 _____ miscellaneous units inspection form (Subpart X) - - - - -D8

INTERIM STATUS TSDF

_____ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D9
 _____ generator appendix inspection form D1
 _____ groundwater monitoring (Subpart F) use w/ Subparts K,L,M&N D10
 _____ tank system storage inspection form (Subpart J) - - - - -D2
 _____ surface impoundments inspection form (Subpart K) D11
 _____ waste piles inspection form (Subpart L) - - - - -D12
 _____ land treatment inspection form (Subpart M) D13
 _____ landfills inspection form (Subpart N)- - - - -D14
 _____ incineration & thermal treatment inspection form (Subpart O&P) D15
 _____ chemical, physical & biological treatment form (Subpart Q) - - -D16

COMMENTS:

Henkel

Henkel Corporation
Parker-Amchem

May 9, 1990

Ms. Cheryl Howe
Senior Environmental Engineer
Hazardous Waste Permits Section
Waste Management Division
Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Revised Closure Plan...
Hazardous Waste Container Storage Area

Reference: Henkel Corporation - Parker+Amchem
Madison Heights, Michigan
MID 057 676 124

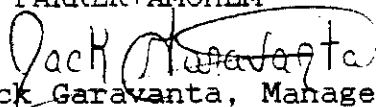
Dear Ms. Howe:

Enclosed are four (4) copies of the above subject closure plan for the above referenced facility. The plan reflects the revisions outlined in your March 9, 1990 "notice of deficiency/letter of warning".

We appreciate your cooperation in this matter. If there are any questions, please do not hesitate to contact me at (313) 583-9300.

Very truly yours,

PARKER+AMCHEM


Jack Garavanta, Manager
Regulatory Affairs

Enclosures

bcc: G. Beyer
J. Richter
R. Walker

HENKEL CORPORATION - PARKER+AMCHEM
MADISON HEIGHTS, MICHIGAN
MID 057676124

CLOSURE PLAN
REVISED: MAY 10, 1990

SUBPART G CLOSURE AND POST CLOSURE

265.110 APPLICABILITY

A. CLOSURE

This section applies to the storage of hazardous wastes in the drum storage area.

- B. This section which applies to owners and operators of disposal facilities does not apply to the Parker+Amchem, Madison Heights facility.

265.111 CLOSURE PERFORMANCE STANDARD

- A. Parker+Amchem will close the facility in a manner that:

1. Minimizes the need for further maintenance, and
2. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

265.112 CLOSURE PLAN

The Part A application facility drawing showed two drum storage areas. This Closure Plan will address only "waste drum storage area no. 1." Attached to this Plan is a diagram showing the basic design of "waste drum storage area no. 1" and the soil sampling locations. Background soil samples will be taken from the facility's front lawn.

"Waste drum storage area no. 2" ceased use on February 11, 1987. The floor was inspected and found not to be cracked. The area was cleaned and the floor was sealed.

A. WRITTEN PLAN

1. Hazardous waste in the drum storage area will be removed to a proper disposal site within ninety (90) days after receiving the final volume of hazardous wastes. After waste removal and clean closure certification, this facility will operate as a "generator" of hazardous wastes subject to the administrative rules of Michigan Act 64.

2. a. The maximum inventory of drums in storage is 195 drums.

b. Type of drum waste stored:

D001...Ignitable	Paint solvents
	Ammonium Persulfate
D002...Corrosive	Acids, Alkalies
D003...Reactive	Arsenic, Mercury, Cyanide
D006...EP Toxic	Cadmium
D007...EP Toxic	Chromium
D008...EP Toxic	Lead
D009...EP Toxic	Mercury

c. Drums are stored in an enclosed building with a concrete floor and curbing with no outlets.

3. a. Drums will be removed to disposal as per closure schedule. The wastes stored within the drum storage area are:

D001	ignitable	
D002	corrosive	
D006----		cadmium
D007	--- EP Toxic...	chromium
D008		lead
D009----		mercury
001D		
003D		

b. Soil samples will be analyzed by an outside accredited laboratory for the following parameters:

Ph	
Cyanide	
Total Metals ----	Arsenic
	Cadmium
	Chromium
	Lead
----	Mercury

4. After removal and off site disposal of all hazardous waste inventory, the drum storage area (including containment curbs) will be decontaminated with a detergent wash and double rinse. All waste waters and residues generated during the wash/rinse cycles will be contained within the containment area, collected, and pumped into drums. The estimated volume of decontamination wash/rinse liquid is anticipated to be less than 100 gallons per cycle.

Drums of wash/rinse water will be moved to the on site waste water treatment system. This system now treats the facility's waste water. The effluent meets all applicable parameters for pre-treatment prior to being discharged to the City of Detroit sewer system.

5. Work will be supervised by Parker+Amchem and performed by an outside contractor. Personnel will be equipped with appropriate protective clothing to ensure the workers' health and safety during the operation. Chemical neutralizers and spill control equipment will be available and will be employed in the event of a spill resulting from the cleaning operations.
6. Hazardous waste sampling methods, soil sampling methods, parameters, and test methods will be conducted in accordance with procedures outlined in "Test Methods for Evaluating Solid Waste", Section 1.2, USEPA Manual SW-846 (see attachment).

B. SCHEDULE FOR CLOSURE

- | | |
|---|----------|
| 1. Thirty days after MDNR approval of the closure plan. | Day 0 |
| 2. Disposal of final inventory of drummed waste. | 90 days |
| 3. Core sampling and analysis. | 100 days |
| 4. Decontamination of storage area. | 120 days |
| 5. Restoration of the storage area for generator accumulation. | 150 days |
| 6. Completion of the closure and Certification submitted to MDNR. | 180 days |

265.114 DISPOSAL OR DECONTAMINATION OF EQUIPMENT

The limited hazardous waste drum storage area obviates the use of heavy equipment for closure activities. Decontamination of equipment will be restricted to a single transfer pump, and steam and water rinse hoses.

The transfer pump decontamination will consist of a steam cleaning and a water rinse of the exterior of the pump and its associated hoses. Equipment contamination wastes will be confined within the drum storage area. These waters will be pumped into a 55 gallon drum and disposed of at the on site waste water treatment system.

265.115 CERTIFICATION OF CLOSURE

Upon completion of closure activities, the owner will submit to the MDNR a certification of closure signed by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will include supporting documentation as follows:

- A. A certification statement signed by both the owner and the independent registered professional engineer that the closure plan has been completed according to its terms or as per any subsequent amendments.
- B. A summary of decontamination procedures and how waste waters and miscellaneous solid materials (e.g. rags, boots, etc.) were disposed.
- C. All core sampling analytical results and procedures with specific references, weather conditions, run-off controls, and decontamination procedures.
- D. Results of all tests including charts, tables, lab sheets, and observation notes.
- E. A copy of the approved closure plan and the agency letter of closure plan approval.
- F. A copy of all manifests for hazardous wastes sent off-site for treatment and/or disposal.
- G. A QA/QC report on analytical activities.

265.142 COST ESTIMATE FOR FACILITY CLOSURE

A. DRUM STORAGE AREA

1. Drum disposal...based on a maximum
of (195) drums of waste, including
transportation... \$28,000.00
2. Site cleanup...includes labor
and materials... *2000.00 to change* \$ 2,500.00
3. Soil testing... \$ 3,000.00

B. CERTIFICATION

Estimated certification cost by
an independent, registered
professional engineer... \$ 4,000.00

C. TOTAL COSTS...FACILITY CLOSURE

Total Cost... \$37,500.00

MISCELLANEOUS

As listed in the "Notice of Deficiency", dated March 9, 1990; MDNR requested two additional items be entered into the closure plan.

1. The name of the facility contact person for closure activities is:

George J. Beyer
Analytical Support Manager

Alternate: Jack Garavanta
Regulatory Affairs Manager

Facility address: 32100 Stephenson Highway
Madison Heights, Michigan 48071

Telephone Number: (313) 583-9300

2. Henkel Corporation - Parker+Amchem will notify the MDNR Waste Management Division, Hazardous Waste Permits Section (517) 373-9881 and the MDNR Northville District (313) 344-4670 at least five work days in advance of the following activities:

- a. Storage pad decontamination
- b. Soil sampling
- c. Soil excavation and resampling (if necessary)
- d. Restoration of the storage pad for generator accumulation.

I. METHODS USED TO SAMPLE DRUMMED HAZARDOUS WASTE INVENTORY

<u>HAZARDOUS WASTES:</u>	D001	Ignitable
	D002	Corrosive
	D006	EP Toxic cadmium
	D007	EP Toxic chromium
	D008	EP Toxic lead
	D009	EP Toxic mercury

For the above listed hazardous wastes:

SAMPLING METHOD: Sampling a drum from "samplers and sampling procedures for hazardous waste streams", EPA 600/2-80-018, page 36.

DESCRIPTION OF SAMPLING: Composite sample from multiple containers, reference section "D" random samples, EPA 600/2-80-018, January, 1980, page 67.

REFERENCE FOR SAMPLE: Test method for the evaluation of solid waste, physical/chemical methods (SW-846).

[NOTE: No listed wastes are in the inventory.]

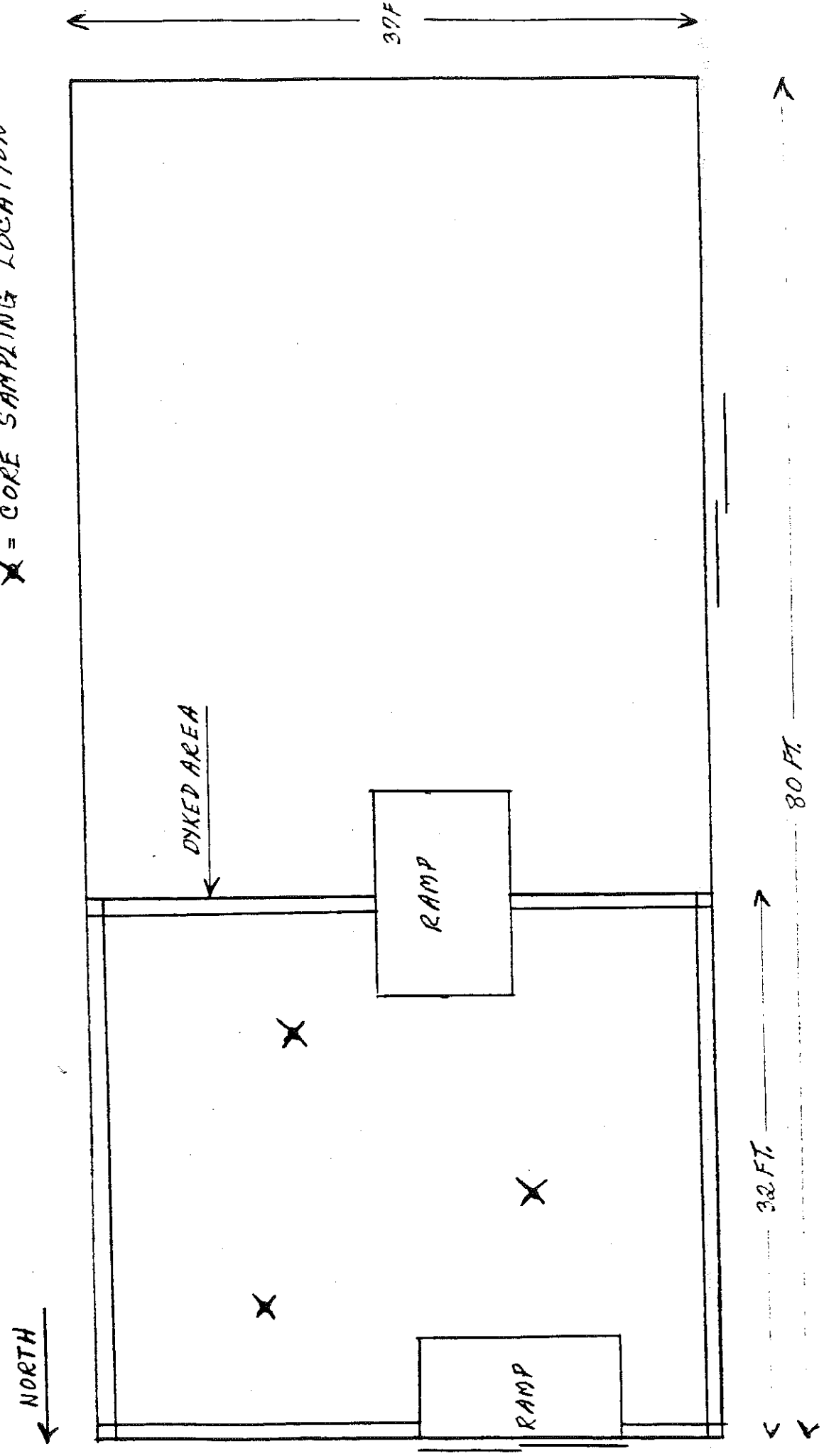
II. PARAMETERS AND TEST METHODS FOR DRUMMED WASTE

<u>PARAMETER</u>	<u>TEST</u>
pH	Method 5.2
Flash Point	Peneky-Martena Closed Cup Tester Method 4.0
Corrosivity	Method 5.2
EP Toxicity	EP Toxicity Appendix II 264.24

REFERENCE: USEPA Manual SW-846..."Test Method for Evaluation of Solid Waste, Physical/Chemical Methods"

WASTE STORAGE AREA NO. 1 (SHED)

X = CORE SAMPLING LOCATION



Contingency Plan and Emergency Procedures
and
SPCC Plan

1. Purpose:

In the event of an emergency at the Madison Heights facility due to fire, explosion, or any unplanned release of hazardous waste to air, soil or surface water, a definite plan is necessary to minimize hazards to human health or the environment.

The provisions of this plan must be carried out immediately whenever there is an emergency due to fire, explosion, or release of hazardous waste.

unplanned

2. Responsibility *Plan Implementation*

The order of responsibility for implementing this plan is as follows:

1. Roger Walker, Vice President, Operations
Office: (313) 583-9300 (X-4613)
Residence: (313) 540-9480
2. Jack Garavanta, Regulatory Affairs Manager
Office: (313) 583-9300 (X-4830)
Residence: (313) 641-7367
3. Dave Grandy, Director, Human Resources
Office: (313) 583-9300 (X-4603)
Residence: (313) 375-9541
4. George Beyer, Technical Manager (SPCC Plan Coordinator)
Office: (313) 583-9300 (X-2364)
Residence: (313) 689-8363
5. Don Cole, Maintenance Foreman (SPCC Alternate Coordinator)
Office: (313) 583-9300 (X-2303)
Residence: (313) 629-9838

→ Home address must be included per 265.52(d)

Handwritten notes:
2
@ 12:00 PM
1/15/88
H. J. [illegible]

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-282-4768 OR OUT OF STATE AT 517-373-7680 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-9302 24 HOURS PER DAY

1. Generator Name Flammable Liquids		2. Generator Address 4215 E. Grand Ave. Detroit, MI 48202		3. EPA ID Number 21-100-01272514	
4. Transporter 1 Company Name Great Lakes Environmental Services		5. Transporter 1 Address 1100 E. Grand Ave. Detroit, MI 48202		6. EPA ID Number 21-100-00000000	
7. Designated Facility Name Flammable Liquids		8. Designated Facility Address 4215 E. Grand Ave. Detroit, MI 48202		9. EPA ID Number 21-100-01272514	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM (20) FLAMMABLE LIQUIDS (20) FLAMMABLE LIQUIDS, N.O.S.				12. Containers No. 20 Type HA	13. Total Quantity NA
14. Additional Information FLAMMABLE LIQUIDS, N.O.S.				15. Unit NA	16. State MI
17. Special Handling Instructions In case of emergency contact the following person:					
18. Generator's Certification I am a large quantity generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. If I am a large quantity generator, I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a small quantity generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a very small quantity generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a household generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a commercial generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a government generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a military generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a nuclear generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a radioactive generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a biohazard generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a chemical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a biological generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a pharmaceutical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a medical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a veterinary generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a research generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a laboratory generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a school generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a community generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a public generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a private generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a commercial generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a government generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a military generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a nuclear generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a radioactive generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a biohazard generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a chemical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a biological generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a pharmaceutical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a medical generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a veterinary generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a research generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a laboratory generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a school generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a community generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a public generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway. I am a private generator. I certify that the waste described above is properly classified, packaged, labeled, and marked in accordance with applicable international and national regulations for transport by highway.					
19. Discrepancy Indication None				20. Date 12/20/97	
21. Facility Owner or Operator Flammable Liquids				22. Date 12/20/97	
23. Printed/Typed Name Bill Drury				24. Date 12/20/97	
25. Printed/Typed Name Bill Drury				26. Date 12/20/97	
27. Printed/Typed Name Bill Drury				28. Date 12/20/97	
29. Printed/Typed Name Bill Drury				30. Date 12/20/97	
31. Printed/Typed Name Bill Drury				32. Date 12/20/97	
33. Printed/Typed Name Bill Drury				34. Date 12/20/97	
35. Printed/Typed Name Bill Drury				36. Date 12/20/97	
37. Printed/Typed Name Bill Drury				38. Date 12/20/97	
39. Printed/Typed Name Bill Drury				40. Date 12/20/97	
41. Printed/Typed Name Bill Drury				42. Date 12/20/97	
43. Printed/Typed Name Bill Drury				44. Date 12/20/97	
45. Printed/Typed Name Bill Drury				46. Date 12/20/97	
47. Printed/Typed Name Bill Drury				48. Date 12/20/97	
49. Printed/Typed Name Bill Drury				50. Date 12/20/97	
51. Printed/Typed Name Bill Drury				52. Date 12/20/97	
53. Printed/Typed Name Bill Drury				54. Date 12/20/97	
55. Printed/Typed Name Bill Drury				56. Date 12/20/97	
57. Printed/Typed Name Bill Drury				58. Date 12/20/97	
59. Printed/Typed Name Bill Drury				60. Date 12/20/97	
61. Printed/Typed Name Bill Drury				62. Date 12/20/97	
63. Printed/Typed Name Bill Drury				64. Date 12/20/97	
65. Printed/Typed Name Bill Drury				66. Date 12/20/97	
67. Printed/Typed Name Bill Drury				68. Date 12/20/97	
69. Printed/Typed Name Bill Drury				70. Date 12/20/97	
71. Printed/Typed Name Bill Drury				72. Date 12/20/97	
73. Printed/Typed Name Bill Drury				74. Date 12/20/97	
75. Printed/Typed Name Bill Drury				76. Date 12/20/97	
77. Printed/Typed Name Bill Drury				78. Date 12/20/97	
79. Printed/Typed Name Bill Drury				80. Date 12/20/97	
81. Printed/Typed Name Bill Drury				82. Date 12/20/97	
83. Printed/Typed Name Bill Drury				84. Date 12/20/97	
85. Printed/Typed Name Bill Drury				86. Date 12/20/97	
87. Printed/Typed Name Bill Drury				88. Date 12/20/97	
89. Printed/Typed Name Bill Drury				90. Date 12/20/97	
91. Printed/Typed Name Bill Drury				92. Date 12/20/97	
93. Printed/Typed Name Bill Drury				94. Date 12/20/97	
95. Printed/Typed Name Bill Drury				96. Date 12/20/97	
97. Printed/Typed Name Bill Drury				98. Date 12/20/97	
99. Printed/Typed Name Bill Drury				100. Date 12/20/97	

HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL NOTICE TO PETRO-CHEM PROCESSING, INC.

On manifest number MI2199789 line item 11a (A, B, C or D), the waste bearing the EPA hazardous waste number(s) 11a F003, 11a F004, 11a F005

is subject to the land disposal restrictions of 40 CFR Part 268. In accordance with 40 CFR 268.7, this generator is providing notice that the waste does not meet the treatment standards specified in Part 268 Subpart D or does not meet the prohibitions specified in 268.32 or RCRA section 3004(d). The treatment standards follow:

Hazardous waste description	Constituents of concern	Nonwastewater		
		Total composition, mg/kg	TCLP, mg/L	Wastewater, total composition, mg/L
<input type="checkbox"/> F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride		0.96	0.05
	Methylene chloride		0.96	0.20
	Tetrachloroethylene		0.05	0.079
	1,1,1-Trichloroethane		0.41	1.05
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
<input type="checkbox"/> F002 - Spent halogenated solvents	Chlorobenzene		0.05	0.15
	1,2-Dichlorobenzene		0.125	0.65
	Methylene chloride		0.96	0.20
	Methylene chloride (from the pharmaceutical industry)		—	0.44
	Tetrachloroethylene		0.05	0.079
	1,1,1-Trichloroethane		0.41	1.05
	1,1,2-Trichloroethane	7.6		0.030
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
<input checked="" type="checkbox"/> F003 - Spent non-halogenated solvents	Acetone		0.59	0.05
	n-Butyl alcohol		5.0	5.0
	Cyclohexanone		0.75	0.125
	Ethyl acetate		0.75	0.05
	Ethyl benzene		0.053	0.05
	Ethyl ether		0.75	0.05
	Methanol		0.75	0.25
	Methyl isobutyl ketone		0.33	0.05
	Xylene		0.15	0.05
<input checked="" type="checkbox"/> F004 - Spent non-halogenated solvents	Cresols (and cresylic acid)		0.75	2.82
	Nitrobenzene		0.125	0.66
<input checked="" type="checkbox"/> F005 - Spent non-halogenated solvents	Benzene	3.7		0.070
	Carbon disulfide		4.81	1.05
	2-Ethoxyethanol	Incineration		Biological degradation or incineration
	Isobutanol		5.0	5.0
	Methyl ethyl ketone		0.75	0.05
	2-Nitropropane	Incineration		(Wet oxidation or chemical oxidation) followed by carbon adsorption or incineration
	Pyridine		0.33	1.12
	Toluene		0.33	1.12

Check the appropriate box(es), and, circle each chemical entity likely to be present in each waste number.

Circle each of the following characteristic wastes also likely to be present in the waste.

Waste Code	Description	Wastewaters	Nonwastewaters
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT
D004	Arsenic (As)	268.43(a)	268.41(a) Variance until 5-8-
D005	Barium (Ba)	268.43(a)	268.41(a)
D006	Cadmium (Cd)	268.43(a)	268.41(a)
D007	Chromium (Cr)	268.43(a)	268.41(a)
D008	Lead (Pb)	268.43(a)	268.41(a)
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a) Variance until 5-8-
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC Variance until 5-8-
D010	Selenium (Se)	268.43(a)	268.41(a)
D011	Silver (Ag)	268.43(a)	268.41(a)
Other Codes	See attachment for supplemental list		

(Check if applicable) This waste is principally an organic liquid, and therefore, it is my best judgement that this material presents substantially the same environmental risk as P001-P005 spent solvents, and this, should be restricted from land disposal.

Generator Firm Name: PARKER + ARCHEM

Generator Signature: George J. Syer

Name & Title of Generator: Technical Manager

EPA ID No.: 111DD57676124 Date: 2-8-91

RJP080190NTI
LDR33

265.15 General Inspection Requirements- All areas at the Parker, Madison Heights facility where hazardous waste is stored, will be inspected weekly. The inspector will look for malfunctions, deteriorations, operator errors, unusual discharges, corrosion to storage drums, leaking drums, bulging drums, compatibility of wastes, adequate aisle space and any other function considered detrimental to a safe operation. An inspection schedule and log will be maintained indicating problems found and remedial action taken. Any spills or deteriorated drums must be corrected immediately and logged.

[illegible]

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility:

Parker Amchem Denkel Corp

U.S. EPA ID No.:

MD 057676124

Street:

32100 Stephenson Highway

City:

Madison Hgts State: MI Zip: 48071

Telephone:

313

Inspection Date:

2/20/91 Time: 10:00 (am/pm)

Weather Conditions:

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>D. M. Amst</u>	<u>MDNR</u>	<u>313 953 0241</u>

Facility Representatives:

George Beyer

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents ^{for} <u>3.45</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
F020-F023 and F026-F028	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List *	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third [40 CFR 268.10]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third [40 CFR 268.11]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Third Third [40 CFR 268.12]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

* See Appendix A

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>F003, 4, 5</u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No ☐ NA ☐

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

☐ Organometallics: 40 Part 268, Appendix IV constituents
☐ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ 50 to 500 ppm PCBs
☐ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content:

Yes ___ No ___ NA ___

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
 ___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ___ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	___/___/___
___	___	___/___/___
___	___	___/___/___

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments _____

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content.

Yes ___ No ___ NA ___

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
 ___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ___ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	___/___/___
___	___	___/___/___
___	___	___/___/___

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☒ No ☐ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☐

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☒

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☒ Based on a detailed chemical and physical analysis of a representative sample
☒ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = 0001(except high TOC nonwastewaters), D002, and 0003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☐

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ☐

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments TSD

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☒ No ☐ NA ☐

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☐ No ☒ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☒ No ___ NA ___

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☒ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☒ No ☐ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
waste waste	waste	water treatment unit -
		permitted
		for discharge

2. Are treatment residuals generated from these units?

Yes ☒ No ☐

Comments filter water

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes No ☒ NA

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist: _____

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 2. Background
 3. Methodology
 4. Results
 5. Discussion
 6. Conclusion
 7. References
 8. Appendix
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RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents Yes ☒ No ☐ NA ☐

F020-F023 and F026-F028 Dioxins Yes ☐ No ☐ NA ☒

California List Wastes Yes ☐ No ☐ NA ☒

First, Second, and Third Third Wastes Yes ☐ No ☐ NA ☒

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? ____/____/____

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

☐ Generator provides data

☒ Facility performs analyses in on-site laboratory

☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☐ No ☐ NA ☒

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☒ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☒ NA

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks? NA

Yes ☐ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ☒

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ☒

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ___ No ___ NA ___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ___ No ___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ___ No ___ NA ___

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. **Surface Impoundments** [40 CFR 268.4]

NA

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ___ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

NA

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☐ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by-case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☒ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☒ No ☐ NA ☐

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

5. **Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions**

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

[illegible]

Figure 1: Schematic representation of the experimental design. The figure shows a 2x2 grid of panels. The top row is labeled 'Control' and the bottom row is labeled 'Dyslexia'. The left column is labeled 'Pre' and the right column is labeled 'Post'. Each panel shows a horizontal line representing a reading passage, with a vertical line indicating the start of the reading task. The 'Pre' panels show a single line, while the 'Post' panels show multiple lines, indicating a more complex reading task.

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes _____ No _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes _____ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

Comments

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes _____ No (If No, go to c.)

Check appropriate category:

____ Dilutes to meet treatment standards
____ Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility:

Parker Amchem Henkel Corp

U.S. EPA ID No.:

MID 057676124

Street:

32100 STEPHENSON HIGHWAY

City:

Madison HgtsState: MI Zip: 48071

Telephone:

313

Inspection Date:

2/29/91Time: 10⁰⁰ (am/pm)

Weather Conditions:

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>D. MBAMAH</u>	<u>MONR</u>	<u>313 953 0241</u>

Facility Representatives:

George Beyer

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>3, 4, 5</u>			<u>90 day st.</u>	<u>3 4 5</u>
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]					

* See Appendix A

(Chromate waste)

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

Signature:

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

March 16, 1989

Mr. Greg Beyer
Technical Manager Analytical & Support
Parker & Amchem
32100 Stephenson Hwy.
Madison Hgts., MI 48071

LB-7X

RE: MID 057676124

Dear Mr. Beyer,

On February 15, 1989, an inspection was conducted at your facility located at 32100 Stephenson Hwy., Madison Hgts., MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement(s):

1. Land Disposal Restrictions. As a generator of California list waste (pH<2), you have not determined if your waste is restricted from land disposal nor the appropriate treatment standard. Also, you have not provided notice, in writing, to the treatment facility. 40 CFR 268.7.

The notice must include the EPA hazardous waste number, corresponding treatment standard, manifest number associated with the shipment of waste and waste analysis data, where available.

2. Containers of hazardous waste were not placed in the storage area in such a way that adequate aisle space was maintained.

Page 2, 3-16-89
Parker & Amchem
RE: MID 057676124

The facility should allow enough aisle space so that a person can inspect all containers and place containers so that all dates and labels are visible.

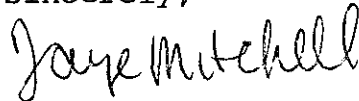
Also, containers of hazardous waste were not always inspected weekly for leaks and defects. 40 CFR 265.174.

3. We are conducting financial reviews for interim status facility. I have not yet received a copy of the facility financial assurance mechanism for closure cost and liability coverage. 40 CFR 265 Subpart H. Please submit those documents to our office as soon as possible.

We request your response by April 17, 1989 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,



Faye Mitchell
Environmental Quality Analyst

FM:bs
Enclosure
cc: B. Okwumabua

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

XXXXXXXXXXXXXXXXXXXX
Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

June 11, 1987

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

Parker Chemical Co.
32100 Stephenson Hwy.
Madison Hgts., MI 48071
ATTN: George J. Beyer, Mgr.
Technical Support Dept.

RE: MID 057676124

Dear Mr. Beyer,

This letter is to acknowledge receipt of your letter dated June 1, 1987 indicating your compliance program for deficiencies cited during my inspection on May 14, 1987. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Faye Dade
Environmental Quality Analyst

FD:bs

cc: U.S. EPA, Region V
B. Okwumabua

*Classified
Violation
etc*

RECEIVED
JUN 15 1987
SOLID WASTE DIVISION
U.S. EPA REGION V



PARKER CHEMICAL COMPANY
32100 STEEL • INTERLIMWAY
MADISON HEIGHTS MICHIGAN 48071
313/583-9300

June 1, 1987

RECEIVED

JUN 02 1987

HAZARDOUS WASTE DIV.

Ms. Faye Dade
Environmental Quality Analyst
MICHIGAN DEPARTMENT OF NATURAL RESOURCES
Waste Management Division
505 West Main
Northville, MI 48167

Reference: MID 057676124

Dear Ms. Dade,

In response to your letter of May 20, 1987, following your RCRA inspection of our facility, we will comply with Title 40, Code of Federal Regulations 268.7 (a) (1) as follows.

Future F-Solvent waste disposals from this facility will be through a licensed disposal contractor; however, we (Parker Chemical Company) will notify, in writing, the treatment facility of the applicable information, i.e.:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of waste; and
- (iv) Waste analysis data, where available.

This information will be attached, as an addendum, to the Hazardous Waste Manifest when the listed waste leaves this facility.

If you have any further questions (or comments) concerning this matter, please contact me at (313) 583-9300, x. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer
George J. Beyer, Manager
Technical Support Department

GJB/mjh

cc: R. Walker

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

~~XXXXXXXXXXXX~~

Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

May 20, 1987

NATURAL RESOURCES COMMISSION

IAS J. ANDERSON
ENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

RECEIVED
JUN 29 1987

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Parker Chemical
32100 Stephenson Hwy.
Madison Heights, MI 48071
ATTN: George Beyer

RECEIVED
JUN 29 1987

RE: MID 057676124

SOLID WASTE DIVISION
U.S. EPA, REGION V

Dear Mr. Beyer,

On May 24, 1987, acting as a representative of the United States Environmental Protection Agency under the provision of the Resource Conservation and Recovery Act (RCRA) state authorization, I performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of RCRA F-Solvent Land Restriction.

As a result of that inspection, it has been determined that you may generate and disposed off-site, F-solvents wastes. Therefore, the facility will need to comply with the following requirement:

1. For each shipment of restricted waste, the generator must notify the treatment facility (including recyclers) in writing of the appropriate treatment standard. The notice must include the EPA waste number, applicable treatment standard, manifest number and waste analysis data, if available. 40 CFR 268.7 (a) (1).

If the F-solvent waste meets treatment standards, the generator must provide the disposal facility with the above information and a certification that the waste meets treatment standards.

We request your response by June 15, 1986 on the above matter. If you have any questions, contact me at (313) 344-4670.

Sincerely,

Faye Dade
Environmental Quality Analyst

FD:bs

Enclosure

cc: U.S. EPA, Region V
B. Okwumabua

ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER
(or Michigan)

M I D 0 5 7 6 7 6 1 2 4

FACILITY NAME

PARKER Chemical

32100 Stephenson Hwy

Madison Heights
CITY

MICHIGAN

48071
ZIP CODE

DATE MAY 14, 1987

TIME OF INSPECTION (FROM) 9⁰⁰ (TO) 11⁰⁰

PERSON(S) INTERVIEWED

TITLE

TELEPHONE

George Beyer

Mgmt. Technical Support

313-583-9300

INSPECTOR(S)

AGENCY/TITLE

TELEPHONE

F. DROE

MDNR/E.O.A.

313-344-4670

Primary Business of this Facility: Research, Development
of Metal Finishing Chemicals

Reason for Inspection:

☒ Routine

☐ Follow-up

☐ Complaint

INSPECTION FORMS:

Based upon the inspection, this facility:

FORM

☐ is a non-generator/conditionally exempt small quantity generator

☐ small quantity generator

☒ generator

☐ transporter

☒ treatment/storage/disposal facility

Date of Last Inspection 10-30-85

10-30-85

INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☐ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☐ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☐ Accepts wastes from off-site sources
- ☐ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☐ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

____ Underground tanks

____ Drums

____ Other

____ Not applicable

WASTE STREAMS

Hazardous Waste
Code/Name

Source

Type
of Storage

How Much

F006

WWTx Sludge

drums.

D001 / D002

mixed lab. wastes

D007

F001

↓

↓

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards

Rule 601, 40 CFR 265, Subpart B

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
------------	-----------	------------	------------------------

1. If required, have the following been notified:

a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)

—	—	✓	II
---	---	---	----

b.) Notified Director of change of owner or operator.
40 CFR Part 270. 265.12(b)

—	—	5/87	II
---	---	------	----

Comments: Change of ownership recently occurred.

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)

✓	—	—	I
---	---	---	---

b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)

✓	—	—	I
---	---	---	---

c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)

—	—	✓	I
---	---	---	---

Comments: _____

INSPECTION FORM D

Violation
Class

Yes

No

N/A

Class

3. Security - If applicable, do security measures include:

- | | | | | | | |
|-----|---|-------------------------------------|--------------------------|--------------------------|------------------------------|--------------------------|
| a.) | 24-hour surveillance? 265.14(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>Security alarm system</u> | <u>I</u> |
| | or | | | | | <u>I</u> |
| b.) | i. Artificial or natural barrier around facility? 265.14(b)(2)(i) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> |
| | and | | | | | |
| | ii. Controlled entry? 265.14(b)(2)(ii) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>I</u> |
| c.) | Danger sign(s) at entrance? 265.14(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>Locked Steel</u> | <u>I</u> |

Comments: _____

4. Owner or operator inspections: 265.15*

- | | | | | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|--|-----------|
| a.) | Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |
| b.) | Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |
| c.) | If so, does the schedule address the inspection of the following items: | | | | | |
| | i. Monitoring equipment? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |
| | ii. Safety and emergency equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |
| | iii. Security devices? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |
| | iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | <u>II</u> |

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D

Violation
ClassYesNoN/AClass

v. Type of problems to be looked
for during the inspection
(e.g. leaky fitting, defective
pump, etc.)?

II

vi. inspection frequency (based
upon the possible deterioration
rate of the equipment)?
265.15(b)(4)

II

d.) Are areas subject to spills in-
spected daily when in use?
265.15(b)(4)

II

e.) Does the owner or operator main-
tain an inspection log or summary
of owner or operator inspections?

II

f.) Does the inspection log contain
the following information:
265.15(d)

i. The date and time of the
inspection? 265.15(d)

II

ii. The name of the inspector?
265.15(d)

II

iii. A notation of the observa-
tions made? 265.15(d)

II

iv. The date and nature of any
repairs or remedial actions?
265.15(d)

II

Comments:

5. Do personnel training records include:
265.16

a.) Job titles? 265.16(d)(1)

I

b.) Job descriptions? 265(d)(2)

I

c.) Description of training?
265.16(d)(3)

I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
d.) Records of training? 265.16(d)(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Do new personnel receive re- quired training within six months? 265.16(d)	<input checked="" type="checkbox"/>	<i>however no new personnel</i>	<input type="checkbox"/>	I
f.) Do personnel training records indicate that personnel have taken part in an annual review of training? 264.16(c)	<input checked="" type="checkbox"/>	<i>10/86 11/86</i>	<input type="checkbox"/>	I

Comments: _____

6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addressed?
265.17

a.) Special handling? 265.17(a)

b.) No smoking signs? 265.17(a)

c.) Separation and protection from
ignition sources? 265.17(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	---

Comments: _____

INSPECTION FORM D

Violation
Class

Yes No N/A

2. If required, does this facility have the following equipment: 40 CFR 265.32

- | | | | | |
|--|---|---|---|---|
| a.) Internal communications or alarm systems. 40 CFR 265.32(a) | ✓ | — | — | I |
| b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b) | ✓ | — | — | I |
| c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c) | ✓ | — | — | I |
| d.) Indicate the volume of water and/or foam available for fire control. | — | — | — | — |

Comments: _____

3. Testing and Maintenance of Emergency Equipment: 265.33

- | | | | | |
|---|---|---|---|---|
| a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33 | ✓ | — | — | — |
| b.) Is emergency equipment maintained in operable condition? 265.33 | ✓ | — | — | — |
| c.) <u>If required</u> , has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a) | ✓ | — | — | — |
| d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35. | ✓ | — | — | I |

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

Comments: _____

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

II

Comments: _____

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

I

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

II

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

II

INSPECTION FORM D

Violation
ClassYesNoN/AClass

- d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) ☒ II
- e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) ☒ II
- f.) Is the facility emergency coordinator identified. 40 CFR 265.55 ☒ II
- g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 ☒ II
- h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 ☒ II
- i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. ☒ I
- j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. ☒ II
- 40 CFR 265.54

Comments: _____

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 255.53(a) 254.53(b)

✓	—	—	II
---	---	---	----

Comments: _____

USE OF MANIFEST SYSTEM
Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:

- a.) Are copies signed and dated.

Rule 608(1)(a)

—	—	—	—
---	---	---	---

- b.) Are significant discrepancies noted on the manifest.
Rule 608(1)(b)

—	—	—	I
---	---	---	---

- c.) Are transporters given 1 copy of the signed manifest.
Rule 608(1)(c)

—	—	—	I
---	---	---	---

- d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

—	—	—	I
---	---	---	---

- e.) Are copies of the manifest retained for 3 years.

—	—	—	I
---	---	---	---

- f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608(1)(f)

—	—	—	II
---	---	---	----

Comments: _____

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

✓			N/A
---	--	--	-----

Comments: _____

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

		✓	I
--	--	---	---

Comments: _____

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

✓			II
---	--	--	----

Comments: _____

2. Does this operating record contain:
265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

✓			II
---	--	--	----

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II <i>hazardous waste stored in outdoor shed</i>
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

Comments: _____

i.) Are all required records available and maintained for at least 3 years. 265.74(3)

☒ ☐ ☐ II

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
------------	-----------	------------	------------------------

Comments: _____

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

✓			II
---	--	--	----

Comments: _____

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

			I
--	--	--	---

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

			I
--	--	--	---

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

			I
--	--	--	---

USE AND MANAGEMENT OF CONTAINERS
Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section. ✓

✓			N/A
---	--	--	-----

- 2 a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c) If no, how many

✓			I
---	--	--	---

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____		✓		I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____	✓			I
d.) Are containers in good condition Rule 306(l)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	✓			I
e.) Are containers compatible with waste in them. RULE 306(l)(a) 40 CFR 265.172. If no, explain _____	✓			I
f.) Are containers stored closed, Rule 306(l)(a), 40 CFR 265.173(a) If no, how many _____	✓			I
g.) Are containers managed to prevent leaks? Rule 306(l)(a), 40 CFR 265.173(b) If no, explain _____	✓			I
h.) Are containers inspected weekly for leaks and defects? Rule 306(l)(a) 40 CFR 265.174.	✓			I
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(l)(a) 40 CFR 265.176. If no, explain _____	✓			I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(l)(a) 40 CFR 265.176. If no, explain _____	✓			I

INSPECTION FORM D


	Yes	No	N/A	Violation Class
k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
Comments: _____				
3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.				
a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
Comments: _____				
4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)				
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
If yes:				
a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

INSPECTION FORM D
Violation

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Class</u>
d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172	_____	_____	_____	I _____
e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173	_____	_____	_____	I _____
f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)	_____	_____	_____	I _____

Comments: _____

TANKS

1. Is hazardous waste accumulated in tanks? If no, skip to c.	_____		_____	N/A _____
a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)	_____	_____	_____	I _____
b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).	_____	_____	_____	I _____
c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?	_____	_____	_____	I _____
d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).	_____	_____	_____	I _____
e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?	_____	_____	_____	II _____

INSPECTION FORM D

Violation

Yes	No	N/A	Class
-----	----	-----	-------

f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

II

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: _____

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

Comments: _____

3. Do owners and operators of underground tanks do all the following:

a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)

X

I

b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)

I

c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)

I

d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)

I

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers? If yes, explain _____

✓

N/A

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
 Part 7 of Act 64 Rules

	Yes	No	N/A	Violation Class
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
iii. estimated year of closure	<input type="checkbox"/>	<input type="checkbox"/>	<u>UNKNOWN</u>	I
iv. schedule of closure activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
Comments:				

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
BB. facility monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
iii. name, address, and phone number of person or office to contact during post-closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 265.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

1. a.) Does the generator have copies of the manifest available for review and on-site. 262.40 ✓ II
- b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 7

Comments: _____

2. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- | | | | |
|-----|--|---|---|
| a.) | Manifest document number
(Rule 304(2)(a)?) | ✓ | II |
| b.) | The generator's name, mailing
address, telephone number, and
EPA Identification number.
Rule 204(2)(b) | ✓ | II |
| c.) | The name and EPA ID number of
transporter. Rule 304(2)(c) | ✓ | II |
| d.) | Name, address, and EPA ID number
of designated permitted facility
and alternate facility.
Rule 304(2)(d) | ✓ | Chem-met
Mich. Disposal
Petro-chem.
Ensoo, Ark. II |
| e.) | The description of waste(s) (DOT
shipping name, DOT hazard class,
DOT identification number.
Rule 304(2)(e) | ✓ | II |

GENERATOR APPENDIX

	Yes	No	N/A	Violation Class
f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) Hazardous waste number describing the wastes. Rule 304(1)(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Certification as required in Rule 304(1)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
i.) Signatures as required in Rule 304(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
j.) Waste minimization program/certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

- a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____ X
- b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

Comments: _____

Facility Name: PARKER Chemical
ID Number: MD 057676124
Inspector: F. DODGE
Date: May 14, 1991

DRAFT
RCRA F-SOLVENT LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

PARKER Chemical 32100 Stephenson Hwy
A. Facility Name B. Street (or other identifier)
Madison Heights MT 48071 Opkland
C. City D. State E. Zip Code F. County Name
R + D Motel Finishing Chemicals
G. Nature of business; identification of operations
MD 057676124
H. EPA ID #
George Beyer 313-583-9300
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]?

☐ Yes ☒ No

however, may not be necessary, storage only.
2. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a)/265.13(a)]?

☒ Yes ☐ No

 - a. Did testing include analyses for all F001-F005 constituents?

☒ Yes ☐ No

When appropriate
 - b. Were analyses performed using TCLP? ☐ Yes ☒ No
waste does not go directly to landfill.
 - c. Were analyses conducted onsite or offsite (identify offsite lab)?

☐ On ☐ Off:
 - d. Describe frequency of sampling _____

 - e. Describe procedures used to identify manifest discrepancies _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? ☒ Yes ☐ No

Facility Name: Pepper Chemical
ID Number: _____
Inspector: _____
Date: _____

C. Storage [268.50]

Comments

1. a. Were restricted wastes exceeding treatment standards stored? ☒ Yes ☐ No
If no, go to "D."
- b. Are all containers clearly marked to identify content and date(s) entering storage? ☒ Yes ☐ No
- c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ☒ Yes ☐ No
- d. Do operating records agree with container labeling? ☒ Yes ☐ No
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☒ No
If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No
If yes, state how: _____
- ~~f.~~ Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ☐ Yes ☐ No
- ~~g.~~ Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No
If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____
- ~~h.~~ Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? ☐ Yes ☐ No

~~D.~~ Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? ☐ Yes ☐ No

If no, go to E.

Inspector: F. DODGE
Address: 305 W Main
NORTHVILLE, MT 58147
Telephone No: 313-344-4620

DRAFT
RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Parker Chemical B. Street (or other identifier) 32100 Stephenson Hwy
C. City Madison Heights D. State MT E. Zip Code 48071 F. County Name OAKLAND
G. Nature of Business; Identification of Operations R+D : Metal Finishing Chemicals
H. EPA ID # MLD 057676124
I. Handler Contact (Name and Phone Number) George Beyer 313-583-9300

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 ☒ Yes ☐ No
b. F002 ☒ Yes ☐ No
c. F003 ☒ Yes ☐ No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

d. F004 ☒ Yes ☐ No
e. F005 ☒ Yes ☐ No

2. Source of the above: Form B700-12 ☐; Part A ☒; Part B ☐;
other (specify) OWN Knowledge

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☒ Yes ☐ No

during inspection

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes

☒ Yes ☐ No *Listed waste.*

b. TCLP

☐ Yes ☐ No

c. Other (specify) _____

If knowledge, note how this is adequate:

product is pure solvent, waste is same.

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- d. Were wastes tested using TCLP when a process or wastestream changed?

☐ Yes ☐ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No
☐ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

☐ Yes ☒ No

D. Management

1. Onsite management

- a. Were F-solvent wastes managed onsite?

☐ Yes ☒ No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: Parker Chemical
ID Number: _____
Inspector: _____
Date: _____

- b. For wastes that exceed treatment standards, was treatment storage and/or disposal conducted?
____ Yes ____ No

Comments

If yes, TSD Checklist must be completed.

- c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
____ Yes ____ No

2. Offsite Management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

- (i) EPA waste number? ____ Yes ☒ No
(ii) Applicable treatment standard? ____ Yes ☒ No
(iii) Manifest number? ____ Yes ☒ No
(iv) Waste analysis data, if available?
____ Yes ____ No

Identify offsite treatment facilities Petro-chem, I
Enesco

- b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

- (i) EPA Hazardous waste number? ____ Yes ____ No
(ii) Applicable treatment standard? ____ Yes ____ No
(iii) Manifest number? ____ Yes ____ No
(iv) Waste analysis data, if available?
____ Yes ____ No
(v) Certification that waste meets treatment standards? ____ Yes ____ No

Identify land disposal facilities receiving the BDAT certified wastes _____

Handler Name: Parker Chemical
ID Number: _____
Inspector: _____
Date: _____

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

Comments

____ Yes ____ No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SOG) [268.50(a)(1)]?

☒ Yes ____ No

If yes, was facility operating as a TSD under interim status or final permit? ☒ Yes ____ No

If yes, TSD Checklist must be completed.

☒ Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

____ Yes ____ No

If yes, list type of treatment unit and processes

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
EENE J. FLUHARTY
HEN V. MONSMA
STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

December 4, 1985

Mr. George J. Beyer
Parker Chemical Company
32100 Stephenson Highway
Madison Heights, Michigan 48071

Re: MID 057676124

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated November 27, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on October 31, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade
HAZARDOUS WASTE DIVISION

FD:mlm

cc: U.S. EPA, Region V
B. Okwumabua



PARKER CHEMICAL COMPANY

November 27, 1985

Ms. Faye Dade
DEPARTMENT of NATURAL RESOURCES
Hazardous Waste Division
Southeast Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

RECEIVED

DEC 02 1985

HAZARDOUS WASTE DIV.

Re: MID057676124

Dear Ms. Dade:

Pursuant to your Resource Conservation and Recovery Act (RCRA) inspection and notification of violation on November 4, 1985, the following steps have been taken to correct our records so that the items and schedule of inspection conforms to Title 40, Code of Federal Regulations, 265.15(b)(1).

Our RCRA facility manual now has a written inspection schedule which covers the following items:

- Fire extinguishers
- Breathing equipment (self-contained air pak)
- Communications/Alarms
- Security devices
- Dikes

This schedule includes the frequency of inspection required for each item, as well as the type of problems to be looked for in each area.

If you have any further questions (or comments) concerning this matter, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer/mjh

George J. Beyer, Manager
Technical Support Department

GJB/mjh

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
EILENE J. FLUHARTY
PHEN V. MONSMA
G. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

November 4, 1985

Mr. George Beyer
Parker Chemical Company
32100 Stephenson Highway
Madison Heights, MI 48071

Re: MID 057676124

Dear Mr. Beyer:

On October 30, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

Though you have developed and maintained an inspection schedule at the facility pursuant to 40 CFR 265.15, general inspection requirements, the records do not identify those specific items inspected as specified in 40 CFR 265.15 (b)(1).

You are requested to respond to this letter by December 2, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Faye M. Dade".

Faye Dade
Hazardous Waste Division

FD:mlm

cc: U.S. EPA, Region V
B. Okwumabua

enclosures

RCRA INSPECTION REPORT

EPA Identification Number: M I D 0 5 7 6 7 6 1 2 4Installation Name: PARKER ChemicalLocation Address: 32100 Stephenson HwyCity: MADISON Heights State: MICHIGANDate of Inspection 10-30-85 Time of Inspection (from) 10³⁰ (to) 12⁰⁰Person(s) Interviewed George Beyer Title Technical Support Telephone 313-583-9300
mgmInspector(s) EAYE DADE Agency/Title MONR/WATER Quality Telephone 313-459-9180
Specialist

Installation Activity (mark only one box)

Inspection Form(s) ...

- | | | |
|-------------------------------------|--|-----|
| <input checked="" type="checkbox"/> | Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> | Treatment/Storage/Disposal (No Generation or Transportation) | A |
| <input type="checkbox"/> | Generation and Transportation | B,C |
| <input type="checkbox"/> | Generation Only | B |
| <input type="checkbox"/> | Transportation Only | C |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>		<u>Inspection Form A section(s)</u>
S01	<input checked="" type="checkbox"/> storage in containers	I
S02	<input type="checkbox"/> storage in tanks	J
T01	<input type="checkbox"/> treatment in tanks	J
S04	<input type="checkbox"/> storage in surface impoundment	K,F
T02	<input type="checkbox"/> treatment in surface impoundment	K,F
D83	<input type="checkbox"/> disposal in surface impoundment	K,F
S03	<input type="checkbox"/> storage in waste pile	L
D81	<input type="checkbox"/> disposal by land application	M,F
D80	<input type="checkbox"/> disposal in landfill	N,F
T03	<input type="checkbox"/> treatment by incineration	O/P
T04	<input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
b. Facility expansion?	—	—	—	N/A
c. Change of owner or operator?	—	—	—	N/A
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	NO offsite Waste Accepted
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	—	—	—	N/A
or				
b. i. Artificial or natural barrier around facility?	—	—	—	N/A
and				
ii. Controlled entry?	✓	—	—	Locked shed
c. Danger sign(s) at entrance?	✓	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓	—	—	

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

✓

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

—

NIA

ii. safety and emergency equipment?

✓

does not

iii. security devices?

✓

~~specific~~ specific

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

✓

items inspected

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

✓

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

✓

d. Are areas subject to spills inspected daily when in use?

✓

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

✓

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

✓

ii. the name of the inspector?

✓

iii. a notation of the observations made?

✓

iv. the date and nature of any repairs or remedial actions?

✓

5. Do personnel training records include: 265.16

a. Job titles?

✓

b. Job descriptions?

✓

Not detailed

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>NO new personnel</u>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

___ ☒ ___

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

☒ ___

b. Telephone or 2-way radios
at the scene of operations?

☒ ___

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ___

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ ___

b. Is emergency equipment
maintained in operable
condition?

☒ ___

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

☒ ___

5. Is there adequate aisle space
for unobstructed movement?

☒ ___

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ ___

documented.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

☒

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☐

☒

NO emergency occurred yet

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	_____	_____	✓ _____	_____
b. Are records of past shipments retained for 3 years?	_____	_____	✓ _____	_____
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	_____	_____	✓ _____	_____
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓ _____	_____	_____	_____
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓ _____	_____	_____	_____
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓ _____	_____	_____	_____
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

vi. All closure and post closure costs as applicable?

✓

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

✓

**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

N/A

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

	YES	NO	NI	Remarks
8. Has the owner or operator developed an <u>outline</u> of a comprehensive ground-water quality assesment program that is capable of determining: 265.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	___	___	___	_____
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	___	___	___	_____
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	___	___	___	_____
*9. Has the owner or operator performed a statistical analysis of his ground-water monitoring data as required in 265.93(b)?	___	___	<u>X</u>	_____
*10. Was there a statistically significant increase (or pH decrease) detected in any well?	___	___	<u>X</u>	_____
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	___	___	<u>X</u>	_____
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?	___	___	___	_____
a. Is the waiver demonstration maintained at the facility?	___	___	___	_____
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	___	___	___	_____

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

Section G CLOSURE AND POST CLOSURE (Part 25 Subpart G)

YES NO NI Remarks

1. Closure 265.112

- a. Is the facility closure plan available for inspection?
- b. Does the plan identify:
 - i. maximum extent unclosed during facility life?
 - ii. maximum hazardous waste inventory?
 - iv. estimated year of closure?
 - v. schedule of closure activities?
- c. Has closure begun?

☒ ☐ ☐
☒ ☐ ☐
☒ ☐ ☐
☒ ☐ ☐
☐ ☒ ☐

*2. Post-Closure 265.118

- a. Is the post-closure plan available for inspection?
- b. Does this plan contain:
 - i. description of groundwater monitoring activities and frequencies?
 - ii. description of maintenance activities and frequencies for
 - AA. integrity of cap, final cover, or containment structures, where applicable
 - BB. facility monitoring equipment
 - iii. name, address, and phone number of person or office to contact during post-closure care period?
- c. Has the post-closure period begun?
- d. Is the written post-closure cost estimate available? 265.144

☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐
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☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐
☐ ☐ ☐

N/A

plies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>2</u>				
(3) Do the manifest forms examined contain the following information: (if possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DDT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
JOE A. HOEFER
EPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

Hazardous Waste Div
1120 W. State Fair
Detroit, MI 48203

June 28, 1984

*JE S
8/1/84
Code R*

Parker Chemical Company
32100 Stephenson Hwy.
Madison Hts., MI 48071

EPA ID No: MID 057676124

Dear Mr. George Beyer:

This letter is to acknowledge receipt of your letter dated June 21, 1984 indicating your compliance program for RCRA deficiencies cited during my inspection on May 23, 1984. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura Lodisio

Laura Lodisio
DETROIT DISTRICT OFFICE

LL:pf

cc J. Bohunsky
B. Okwumabua
U.S. EPA



YES
8/1/84
Code R

PARKER CHEMICAL COMPANY
32100 STEPHENSON HIGHWAY
MADISON HEIGHTS, MICHIGAN 48071
313/583-9300

June 21, 1984

Ms. Laura L. Lodisio
Department of Natural Resources
ENVIRONMENTAL PROTECTION BUREAU
1120 W. State Fair Avenue
Detroit, MI 48203

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

I have listed below (referencing your numbers) the actions which have been taken to correct the RCRA, Subtitle C, violations found at our Madison Heights facility during the RCRA inspection on May 23, 1984.

Items 1 & 2

A training program has been developed for all of the facility employees who handle, or are involved with, our waste. This is being given in two sessions (June 21 & 26, 1984). Following the training sessions, the Personnel training records will be updated.

Item 3

All of the waste drums in this area have been properly identified and labeled as "Hazardous Waste".

Item 4

An inventory list is now available in the RCRA log book which indicates the waste name and quantity at each storage area.


Item 5

Copies of the revised Contingency Plan, dated April 19, 1984, were sent on June 13, 1984, to the local emergency response agencies (Fire Department, Police Department, William Beaumont Hospital - Troy).

If further documentation, or clarification, is necessary, please contact me at 313/583-9300, x.2364.

Very truly yours,

PARKER CHEMICAL COMPANY


George J. Beyer, Manager,
Technical Support Department

GJB/mjh

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
C. R. CAROLLO
JOE A. HOEFER
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STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION BUREAU
1120 W. State Fair Avenue
Detroit, Michigan 48203

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

May 31, 1984

Parker Chemical Company
32100 Stephenson Hwy.
Madison Hts., MI 48071

EPA ID No: MID 057676124

Dear Mr. George Beyer:

On May 23, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

- 1) Facility personnel have not taken part in an annual review of training (last training session was July, 1982) as required per 40 CFR 265.16(c).
- 2) Personnel training records and documents are not current (pending annual review) as required per 40 CFR 265.16(d).
- 3) While being accumulated on-site each container is not labeled or clearly marked with the words "Hazardous Waste" as required per 40 CFR 262.34(a)(3). This is of primary concern in the collection area which you identify as Waste Drum Storage Area No. 3. Because of the various types of waste being collected in this area and the fact that other drums which contain product are stored here it is of prime importance that these wastes are clearly identified to avoid any possibility of a problem from inadvertent mixing, etc...
- 4) The operating record must contain an inventory documenting the location of each hazardous waste within the facility and the quantity at each location. It is noted that there were several drums in storage area number 1, which were not inventoried because they were not yet identified. Also, please be advised that any of the drums taken from the collection points (Areas 2,3,4) and put into storage should be immediately added to this inventory. The drums should be inventoried as soon after they are filled as possible and moved to the contained storage shed (Area 1).

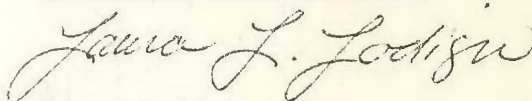
Parker Chemical Company
May 31, 1984
page two

- 5) Copies of the recent (April 19, 1984) revisions to your Contingency Plan have not yet been submitted to the local emergency response agencies as required per 265.53.

You are requested to respond to this letter by June 25, 1984, providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of page one of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION



Laura Lodisio
DETROIT DISTRICT OFFICE

LL:pf
Enclosure

cc J. Bohunsky
K. Burda
EPA

RCRA Inspection Report

EPA Identification Number: M I D 057676124
 Installation Name: PARKER CHEMICAL CO. (SUBSID. OF FORD MC
 Location Address: 32100 STEPHENSON HWY.
 City: MADISON HTS. State: MICHIGAN 48071
 Date of inspection: 05-23-84 Time of inspection (from) 2:00 (to) 3:30

Person(s) interviewed	Title	Telephone
<u>GEORGE BEYER</u>	<u>TECH. SUPPORT MGR.</u>	<u>(313)358-9300</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>LAURA LOUISIO</u>	<u>MONR-RESOURCE</u> <u>SPECIALIST</u>	<u>(313)368-3335</u>
_____	_____	_____

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

N.A.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

N.A.

S02 - Line 2; no storage in tanks.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	<u>X</u>	—	
b. Facility expansion?	—	<u>X</u>	—	
c. Change of owner or operator?	<u>X</u>	—	—	<u>Notified 9-29-13. Co still waiting to be back on financial assurance.</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	—	—	<u>Analyze filter cake - 223/yr. Lab picks other waste are based on knowledge chemicals used.</u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	<u>X</u>	<u>No off-site waste</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	—	<u>X</u>	—	
or				
b. i. Artificial or natural barrier around facility?	—	<u>X</u>	—	
and				
ii. Controlled entry?	<u>X</u>	—	—	<u>Shed locked for</u>
c. Danger sign(s) at entrance?	<u>X</u>	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	—	—	

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility? X _____
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment? _____ X not required
 - ii. safety and emergency equipment? X _____ } Conducted & Maintenance daily.
 - iii. security devices? X _____ }
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)? X _____
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? X _____ - explanation of things to be looked for on top of inspect. sheet.
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)? X _____ - weekly
- d. Are areas subject to spills inspected daily when in use? X _____
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? X _____
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection? X _____
 - ii. the name of the inspector? X _____
 - iii. a notation of the observations made? X _____
 - iv. the date and nature of any repairs or remedial actions? X _____
5. Do personnel training records include: 265.16
- a. Job titles? X _____
 - b. Job descriptions? X _____

	YES	NO	NI	Remarks
c. Description of training?	—	<u>X</u>	—	<u>Nothing since</u>
d. Records of training?	—	<u>X</u>	—	<u>July 1982</u>
e. Did facility personnel receive the required training by 5-19-81?	—	<u>X</u>	—	↓
f. Do new personnel receive required training within six months?	—	<u>X</u>	—	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<u>X</u>	—	—	<u>ignitables on</u>
b. No smoking signs?	<u>X</u>	—	—	
c. Separation and protection from ignition sources?	<u>X</u>	—	—	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— X —

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

X — —

- P.A. System.
- Co. has installed an
alarm button in storage
shed which sounds
main Bldg.

b. Telephone or 2-way radios
at the scene of operations?

X — —

- Telephones.

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

X — —

- Fire extinguishers
- Absorbent pads, pillow
materials.
- Soda Ash
- Vermiculite.

Indicate the volume of water and/or foam available for fire control:

City Water Supply

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

X — —

Fire systems - outside
contract.
Safety equipment
done in-house

b. Is emergency equipment
maintained in operable
condition?

X — —

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

X — —

5. Is there adequate aisle space
for unobstructed movement?

X — —

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

X — —

But need to see
them revision
in Contingency
plan.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — —

Plan was revised on April 19, 1981 to incorporate chg's due to chg. in ownership & update in closure eq.

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — —

Will send review Cont. Plan.

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X — —

(See 1.b.)

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	<u>George Beyer</u>
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	—
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	—
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	—	—	<u>X</u>	<u>No emergency has occurred.</u>

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	X	} No off-site waste accepted
b. Are records of past shipments retained for 3 years?	—	—	X	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	X	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	X	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	X	—	—	However need to address Stg. area. #2
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — X

Not a disposal
facility

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

— — X

Have had none

vi. All closure and post closure costs as applicable?

X — —

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X — —

**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

~~— — —~~

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

~~— — —~~

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G CLOSURE AND POST CLOSURE (Part 265 subpart G)

	YES	NO	NI	Remarks
Closure 265.112				
a. Is the facility closure plan available for inspection?	<u>X</u>	<u> </u>	<u> </u>	<u>plan revised 4/</u>
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
ii. maximum hazardous waste inventory?	<u>X</u>	<u> </u>	<u> </u>	<u>195 Drums</u>
iv. estimated year of closure?	<u> </u>	<u> </u>	<u>X</u>	<u>None</u>
v. schedule of closure activities?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Has closure begun?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<u> </u>	<u> </u>	<u> </u>	<u> </u>
BB. facility monitoring equipment	<u> </u>	<u> </u>	<u> </u>	<u> </u>
iii. name, address, and phone number of person or office to contact during post-closure care period?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c. Has the post-closure period begun?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
d. Is the written post-closure cost estimate available? 265.144	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>X</u>	—	—	_____
2. Are containers compatible with waste in them? 265.172	<u>X</u>	—	—	_____
3. Are containers managed to prevent leaks? 265.173	<u>X</u>	—	—	_____
4. Are containers stored closed?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	—	—	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<u>X</u>	—	—	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<u>X</u>	—	—	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	—	—	<u>lab packs.</u>

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

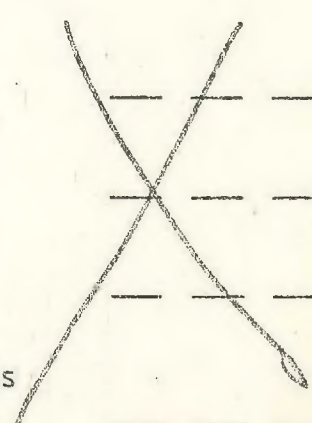
YES NO NI Remarks

- (1) Does the operator have copies of the manifest available for review? 262.40 X _____
- (2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 1 manifest for past year
- (3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21
- a. Manifest document number? X _____
- b. Name, mailing address, telephone number, and EPA ID number of Generator X _____
- c. Name and EPA ID Number of Transporter(s)? X _____
- d. Name, address, and EPA ID Number Designated permitted facility and alternate facility? X _____
- e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? X _____
- f. The total quantity of waste(s) and the type and number of containers loaded? X _____
- g. Required certification? X _____
- h. Required signatures? X _____
- (4) Reportable exceptions 262.42

- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. none

However
shipments
did
arrive
at
TSD facility
for about
20 days.

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	___	___	_____
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	___	___	_____
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	___	___	_____
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	___	___	_____

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	___	<input checked="" type="checkbox"/>	___	_____
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

Remarks:

EXPLANATION OF AREAS NOTED
ON PART A (PAGE 5 OF 5).

- #1. - PRIMARY DIKED STORAGE AREA IN ENCLOSED SHED.
- #2. - COLLECTION AREA FOR SM. QUANTITIES VARIOUS LAB WASTE WHERE THEY ARE SORTED AND PACKED INTO LAB DUMPS (THEN TO AREA #1).
- #3. - VARIOUS SOLVENT & PAINT COLLECTION AREA. DRUMS FILLED HERE THEN BROUGHT TO AREA #1.
- #4. - 1 DRUM UNDER FILTER PRESS FOR COLLECTION OF FILTER CAKE THEN SENT TO AREA #1.
- #5. - WASTE WATER TREATMENT COLLECTION TANK PRIOR TO PROCESSING (4-82B) THROUGH FILTER PRESS. (SHOULD NOT BE INCLUDED.)

MID 057 676124

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

ACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

James J. Blanchard, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave
Detroit, MI 48203
(313) 368-3335

July 27, 1983

Parker Surface Treatment Products
Occidental Chemical Corporation
32100 Stephenson Hwy.
Madison Hts., MI 48071

MID 057 676124

Attention: George J. Beyer; Mgr.; Technical Support Dept.

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated July 14, 1983 indicating your compliance program for RCRA deficiencies cited during our inspection on June 14, 1983. We consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

cc: Ken Burda
J. Bohunsky
U.S. EPA

Occidental Chemical Corporation

July 14, 1983

Ms. Laura L. Lodisio
DEPARTMENT of NATURAL RESOURCES
Hazardous Waste Division
Detroit District Office
1120 W. State Fair Avenue
Detroit, MI 48203

RECEIVED

JUL 15 1983

GAD DETROIT DIST

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

The violation of the requirements of Subtitle C of RCRA referenced in your letter of June 20, 1983, for our Madison Heights facility, is being corrected.

This requirement for an internal communication or alarm system for our hazardous waste storage shed will be resolved by installing an emergency button ("Panic Button") in the shed with an audible signal in the main facility in the shipping/maintenance areas. This equipment has been ordered and installation will be complete within 30 days.

If further documentation or clarification is necessary, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION
PARKER Surface Treatment Products



George J. Beyer
Manager

Technical Support Department

GJB/mz



PARKER Surface Treatment Products

32100 Stephenson Highway, Madison Heights, Michigan 48071 313/583-9300

*Status 3,
Code*

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
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DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Avenue
Detroit, MI 48201
(313) 368-3335

June 20, 1983

Parker Surface Treatment Products

Occidental Chemical Corp.

32100 Stephenson Hwy.
Madison Heights, MI 48071

EPA ID No.: MID 057676124

Attention: George Beyer, Technical Support Mgr.

Dear Mr. Beyer:

On June 14, 1983, I conducted an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The hazardous waste storage area of the facility is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel or a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio capable of summoning emergency assistance as required per 40 CFR 265.32.

You are requested to respond to this letter by July 15, 1983 providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura L. Lodisio

Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

Enclosure

cc: U.S.EPA

J. Bohunsky

K. Burda

GES
7/27/83
Status 3
Code X

RCRA Inspection Report

EPA Identification Number: M I D 0 5 7 6 7 6 1 2 4

Installation Name: PARKER SURFACE TREATMENT PDTS. - OCCIDENTAL

Location Address: 32100 STEPHENSON HWY. CHEMICAL CORP.

City: MADISON HEIGHTS State: MICHIGAN

Date of inspection: 06-14-83 Time of inspection (from) 1:00 (to) 3:30

Person(s) interviewed

Title

Telephone

GEORGE BEYER

TECHNICAL SUPPORT
MANAGER

(313) 583-9300

Inspector(s)

Agency/Title

Telephone

LAURA LODISIO

MDNR - RESOURCE
SPECIALIST

(313) 368-3335

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	J
T01	<input checked="" type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR ☒
TRANSPORTER ☐

APPENDIX GN
APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

S02, T01 - No storage or treatment in tanks.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	ND	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				NA
b. Facility expansion?				N.A.
c. Change of owner or operator?	✓			Letter to U.S. EPA dated 07-02-82.
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			Analysis of sludge 2-3 times/year. Analysis of lab pack on individual basis.
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			✓	No off-site waste accepted.
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?		✓		
or				
b. i. Artificial or natural barrier around facility?		✓		
and				
ii. Controlled entry?	✓			locked shed.
c. Danger sign(s) at entrance?	✓			Put up additional sign as required
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

✓

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

— — — N.A

ii. safety and emergency equipment?

— — — - In maintenance

iii. security devices?

✓ — — - All inspections

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

✓ — — conducted by maint. dept

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

✓

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

✓ — — weekly/bi-weekly

d. Are areas subject to spills inspected daily when in use?

✓ — — shed

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

✓

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

✓ — — not time, but not necessary

ii. the name of the inspector?

✓

iii. a notation of the observations made?

✓

iv. the date and nature of any repairs or remedial actions?

✓

5. Do personnel training records include: 265.16

a. Job titles?

✓

b. Job descriptions?

✓

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	lists subjects discuss - no thorough descrip.
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A. - No new personnel.
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Due for one in July. It is planned to take place.
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If there is flammable wastes.
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

→ Mr. Beyer has attended corporate level hazardous waste seminars and DOT sponsored training programs. He conducts in-house training for all other employees. They also will be using an Audio-Visual Presentation used at their Morenci, Mich. Facility.

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES NO NI Remarks

— ✓ —

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

✓ — —

b. Telephone or 2-way radios at the scene of operations?

✓ — —

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ — —

Alarms & communication are in the plant but not in storage shed. As yet co. feel there has been no need, however, continuing below

*- portable fire extinguishers
- spill control equip.
- sorbent pillows
- spill tamer
- containers*

Indicate the volume of water and/or foam available for fire control:

*City water supply -
fire hydrants*

3. Testing and Maintenance of Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ — —

b. Is emergency equipment maintained in operable condition?

✓ — —

*- extinguishers - contractors
- all other equip.
inspected by maint. dept*

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

✓ — —

5. Is there adequate aisle space for unobstructed movement?

✓ — —

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

✓ — —

*- written documentation
- they have copies of emergency procedures*

** the stg. shed is significantly isolated from the main plant and appears there is a need for some sort of communication sys. to main plant especially if a person was alone & required emerg. assistance.*

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

*Chain of Command
has been designated
as required per*

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

*Fire
Police
Hospitals* } *documented
July 12, 1988*

✓

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

documented

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
			<input checked="" type="checkbox"/>	No emergency has occurred as of yet.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)			✓	
b. Are records of past shipments retained for 3 years?			✓	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
			✓	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓			
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓			
***iii. A map or diagram of each cell or disposal area				

Since last inspection Co. has begun to keep in plant inventory.

*** only applies to disposal facilities

NOTE:

E-1

Chemical Waste Mgt. is designated TSD.

4/82-A

Ohio facility is transporting Alabama site is TSD.

YES NO NI

Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

- v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

- vi. All closure and post closure costs as applicable?

✓

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

5. **Unmanifested Waste Reports 265.76

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

*Disposal Facility does waste analysis of lab wastes.
Co. does analysis of Haz. sludge.*

Updated 5-19-83 to include inflation factor.

N.A. - No off-site waste accepted.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

☒ ☐ ☐

b. Does the plan identify:

i. maximum extent unclosed during facility life?

☐ ☐ ☒

ii. maximum hazardous waste inventory?

☒ ☐ ☐

iv. estimated year of closure?

☒ ☐ ☐

v. schedule of closure activities?

☒ ☐ ☐

c. Has closure begun?

☐ ☒ ☐

*195 drums - max
NA.*

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

☐ ☐ ☐

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

☐ ☐ ☐

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

☐ ☐ ☐

BB. facility monitoring equipment

☐ ☐ ☐

iii. name, address, and phone number of person or office to contact during post-closure care period?

☐ ☐ ☐

c. Has the post-closure period begun?

☐ ☐ ☐

d. Is the written post-closure cost estimate available? 265.144

☐ ☐ ☐

Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Shed</i>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Lab packs only</i>

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<i>2 in past year. 12-28-82 5-5-83</i>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DDT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				<i>Last shipment has been ~40 days. Will check.</i>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				<i>None</i>

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A. -
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage Facility
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

SEP 17 1982

5HW-TUB

Mr. Ken Walker
824 North Street
Morenci, Michigan 49256

MID 057676124

Dear Mr. Walker:

As we discussed in telephone conversations on September 16, 1982, I am sending you a copy of the Compliance Order this agency issued to Occidental Chemical Corp., Parker Surface Treatment Products Division. The Order cites violations of hazardous waste management regulations under the Resource Conservation and Recovery Act.

Thank you for your concern in this matter. If you have any questions or wish to discuss the Order further, please contact me at (312) 886-7482.

Sincerely,

Sally K. Swanson
Environmental Protection Specialist

Enclosure

cc: Alan J. Howard, Chief
Office of Hazardous Waste Management
Michigan Department of Natural Resources

bcc: Gade, ORC

S.Swanson:rita:5HW-TUB:6-7444:9-17-82

PARKER DIVISION

HOOKER CHEMICALS & PLASTICS CORP. • 32100 Stephenson Highway, Madison Heights, MI 48071 • Tel. (313) 583-9300

July 12, 1982

RECEIVED

JUL 14 1982

RECEIVED
RESOURCE RECOVERY
S.E. MICHIGAN REGION
DIVISION OFFICE JUL 16 1982

ACT 64

Mr. Larry AuBuchon
Department of Natural Resources
Resource Recovery Division
Southeast Michigan Region
State Fairgrounds
1120 W. State Fair Ave.
Detroit, MI 48203

Dear Mr. AuBuchon:

The items referred to in your RCRA Inspection Report, which was based on your RCAA inspection of our facility on June 15, 1982, have all been acted upon, or corrected.

The corrections are as follows:

1. Name change - A form letter indicating our facility name change has been sent to the U.S. EPA, Region V, Chicago, IL.
2. Section B, Question 3.c - The additional signs for the shed have been ordered and will be posted as soon as they are received.
3. Section B, Question 4.d - We will comply by conducting weekly inspections of all waste storage areas.
4. Section B, Question 4.f - The inspection log now contains notations on observations made concerning stored waste and the appropriate actions taken.
5. Section B, Question 5.g - The personnel involved with waste management and handling will be given an annual review of the program and will sign-off in the RCRA manual by July 30, 1982.
6. Section D, Question 1.a - The Contingency Plan chain-of-command has been clarified so that it includes the SPCC Coordinator.
7. Section D, Question 1.b - Local Fire and Police Departments have been notified by sending them copies of our Contingency Plan which includes: Coordinators, evacuation plan, coordinators responsibilities, emergency equipment, spill control equipment and communications available and its location in the facility.
8. Section D, Question 1.d - A list of all emergency equipment available and its location is included in the Contingency Plan.
9. Section D, Question 2. - Same as item 7 above.

(continued)

PARKER

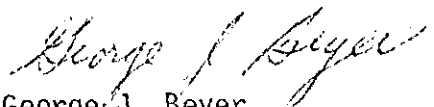
page 2

10. Section E, Question 3.b.ü. - A list indicating the location and quantity of all hazardous waste drums is now available in the RCRA manual.
11. Section G, Question 1.b.ü. - The maximum hazardous waste inventory is listed in the RCRA manual as 195 Drums.
12. Section G, Question 1.b.iv. - The sequence of closure activities is now outlined in the RCRA manual.

If further clarification is necessary, please contact me.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION
PARKER Surface Treatment Products


George J. Beyer
Technical Support Manager

GJB/mz

EPA

NATURAL RESOURCES COMMISSION

JACOB A. HOEFFR
CARL T. JOHNSON
F. M. LAITALA
V. F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

June 17, 1982

RESOURCE RECOVERY COMMISSION

THOMAS J. BLESSING, JR.
ALBERT M. BORKIN
ANN ESKRIDGE
PAMELA A. FRUCCI
C. ERNEST KEMP
JOHN W. LAYMAN
CLIFFORD MILES
STUART B. PADNOS
ROGER RASMUSSEN
JAMES STORNANT
MICHAEL L. WALKINGTON

George Beyer, Technical Support Mgr.
Occidental Chemical Corp.
Parker Surface Treatment Products
32100 Stephenson Hwy.
Royal Oak, MI 48071

RESOURCE RECOVERY DIVISION

SE MICHIGAN REGION
STATE FAIRGROUNDS
1120 W. STATE FAIR AVE.
DETROIT, MI 48203

313/368-3335

EPA ID # MID057676124

Dear Mr. Beyer:

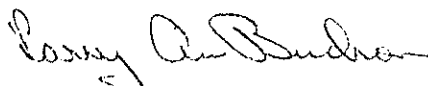
On June 15, 1982, I conducted an investigation of your facility at 32100 Stephenson Hwy., Madison Heights, MI to evaluate compliance of the facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

Enclosed is a copy of the inspection report. I feel that your facility is substantially in compliance with the requirements, however, there are a few minor points which still need to be addressed and/or clarified. Please refer to the inspection report and the remarks section and, as appropriate, address the alterations.

You are requested to respond to this letter by July 16, 1982 providing information regarding those actions to correct these identified points. Please address your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
RESOURCE RECOVERY DIVISION



Larry AuBuchon
SOUTHEAST MICHIGAN REGION

LA:pf

cc: Al Howard, OHWM
EPA

RECEIVED

JUN 21 1982

ACT 64



RCRA Inspection Report

Identification Number: MI T D 0 5 7 6 7 1 2 4

Installation Name: Parker Div. Cxy Metal Industries Corp.

Location Address: 32100 Telegraph Highway

City: Warren, MI State: MI

Date of inspection: 6/18/82 Time of inspection (from) 0930 (to) 1100

Person(s) interviewed	Title	Telephone
<u>George Beyer</u>	<u>Tech Support Mgr.</u>	<u>(313) 583-9300</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Buchanan</u>	<u>MDNR-RRD / Water Quality Spec</u>	<u>(313) 368-3335</u>
_____	_____	_____

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

RECEIVED

JUN 21 1982

ACT 64

As of June 1, 1982 facility has name change.
 New name: Occidental Chemical Corporation -
Parker Surface Treatment Products

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding:				
a. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
b. Facility expansion?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
c. Change of owner or operator?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
2. General Waste Analysis:				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u> </u>	<u> </u>	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	<u> </u>	<u> </u>	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
3. Security - Do security measures include: (if applicable)				
a. 24-Hour surveillance?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
or				
b. i. Artificial or natural barrier around facility?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
and				
ii. Controlled entry?	<u>X</u>	<u> </u>	<u> </u>	
c. Danger sign(s) at entrance?	<u>X</u>	<u> </u>	<u> </u>	<u>Place additional sign at 2nd entrance with no smoking sign. (Storage Area)</u>
4. Owner or operator inspections:				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	<u> </u>	<u> </u>	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				<u>N/A</u>
ii. safety and emergency equipment?				<u>N/A</u>
iii. security devices?	<u>X</u>			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				<u>N/A</u>
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>			<u>weekly</u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>			<u>check areas only check weekly</u>
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>			
ii. the name of the inspector?	<u>X</u>			
iii. a notation of the observations made?	<u>X</u>			<u>indicate observation</u>
iv. the date and nature of any repairs or remedial actions?	<u>X</u>			
5. Do personnel training records include:				
a. Job titles?	<u>X</u>			
b. Job descriptions?	<u>X</u>			

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	<u>X</u>	—	—	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	<i>Personnel have annual review of page.</i>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	<u>X</u>	—	—	_____
b. No smoking signs?	<u>X</u>	—	—	<i>Insure adequate "no smoking" signs posted posted.</i>
c. Separation and protection from ignition sources?	<u>X</u>	—	—	_____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES NO NI Remarks

 X

2. If required, does the facility have the following equipment:

a. Internal communications or alarm systems?

 X

b. Telephone or 2-way radios at the scene of operations?

 X

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

 X

*Check items of area down 2
Work Area in Community
same as 2
No need identified for sign
installation*

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

 X

b. Is emergency equipment maintained in operable condition?

 X

4. Has owner or operator provided immediate access to internal alarms? (if needed)

 X

5. Is there adequate aisle space for unobstructed movement?

 X

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

 X

YES NO NI Remarks

Does the Contingency Plan contain the following information:

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- X Clarify basis of compliance
- b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- X Plan is met on file at the agencies, arrangements on informal basis established
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- X
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- X Same list is available
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- X
2. Are copies of the Contingency Plan available at the site and local emergency organizations?
- X Plan was just developed will disseminate to site locations & emergency organizations

	YES	NO	NI	Remarks
Emergency Coordinator				
a. Is the facility Emergency Coordinator identified?	<u>X</u>	___	___	_____
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	___	___	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	___	___	_____
4. Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	___	___	___	<u>No emergency occurred.</u>

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
* 1. Use of Manifest System				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	N/A
b. Are records of past shipments retained for 3 years?	—	—	—	N/A
* 2. Does the owner or operator meet requirements regarding manifest discrepancies?	—	—	—	N/A
* Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record				
a. Does the owner or operator maintain an operating record as required in 265.73?	X	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	X	—	—	
***iii. A map or diagram of each cell or disposal area				<i>* indicate location & quantity of hazardous waste within the facility - mainly prior to placement in shed.</i>

*** only applies to disposal facilities

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

v. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A

vi. All closure and post closure costs as applicable?

X

4. Availability of Records

Are all facility records required under 40 CFR Part 265 available for inspection?

X

5.**Unmanifested Waste Reports

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

N/A

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure				
a. Is the facility closure plan available for inspection?	<u>X</u>	—	—	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	—	—	—	<u>N/A</u>
ii. maximum hazardous waste inventory?	—	<u>X</u>	—	<u>Est. max inventory</u>
iii. estimated year of closure?	—	—	—	<u>N/A</u>
iv. schedule of closure activities?	—	<u>X</u>	—	<u>Sequence of closure</u>
c. Has closure begun?	—	<u>X</u>	—	<u>N/A</u>
d. Is written closure cost estimate available?	<u>X</u>	—	—	
*2. Post-Closure				
a. Is the post-closure plan available for inspection?	—	—	—	<u>N/A</u>
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	—	—	—	
BB. facility monitoring equipment	—	—	—	
iii. name, address, and phone number of person or office to contact during post-closure care period?	—	—	—	
c. Has the post-closure period begun?	—	—	—	
d. Is the written post-closure cost estimate available?	—	—	—	

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Pa 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition?	<u>X</u>	—	—	_____
2. Are containers compatible with waste in them?	<u>X</u>	—	—	_____
3. Are containers managed to prevent leaks?	<u>X</u>	—	—	_____
4. Are containers stored closed?	<u>X</u>	—	—	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	—	—	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>X</u>	—	—	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply).	<u>X</u>	—	—	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	—	—	_____

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review?	<u>X</u>	___	___	___
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>0</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).				
a. Manifest document number?	<u>X</u>	___	___	___
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>	___	___	___
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>	___	___	___
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>	___	___	___
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	___	___	___
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	___	___	___
g. Required certification?	<u>X</u>	___	___	___
h. Required signatures?	<u>X</u>	___	___	___
(4) Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations:				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

June 4, 1981

Mr. Ralph Feeney
U.S. Environmental Protection Agency
Region 5
Water and Hazardous Materials Compliance Section
230 South Dearborn Street
Chicago, Illinois 60604

Re: EPA I.D. No. MID057676124
RCRA Inspection

Dear Mr. Feeney:

Per our phone conversation on May 27, 1981 concerning the RCRA Inspection conducted at our facility on March 11, 1981 by the Michigan DNR, I am writing to confirm our correction of the seven minor violations cited.

Citation 1. No mixed lab waste analysis plan

No analysis plan was available at the time of the inspection because no mixed lab waste had been disposed of at that time. Mixed lab waste consists of obsolete raw chemicals and small quantity of lab mixtures. These wastes are segregated by class and hazard, itemized and placed in DOT 55 gallon drums with the appropriate labels for storage until disposal.

Citation 2. "Danger" signs not posted

At the time of the inspection the signs were on order. The signs have been received and are posted on the exterior entrance to the main facility and on the door of the storage shed.

Citation 3. Training Records

Complete training records including job titles, training description and record of training were prepared and available prior to May 19, 1981.

Citation 4. "No Smoking" signs

At the time of the inspection these signs were on order. The signs have been received and are posted in the storage areas.

OMI

Mr. Ralph Feeney
Page 2
June 4, 1981

Citation 5. Contingency Plan

An updated Contingency Plan and Emergency Procedures Manual is now available which indicates emergency coordinators, a list and location of emergency equipment and other items as specified in Subpart D.

Citation 6. Waste Drum Inspection

A hazardous waste inspection log is now being maintained. Storage areas and drums are inspected weekly for deteriorations, corrosion, leaking or bulging drums, compatibility of wastes, aisle space and any other function considered detrimental to a safe operation.

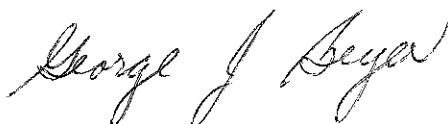
Citation 7. Placards

Placards for the transporter are available if required and we will verify proper truck placarding prior to the transporting of hazardous waste.

During our conversation you indicated the violations are minor and no further action is expected provided they are corrected. If there are any questions which I have not adequately answered, please notify me. It is hoped that this information will be sufficient to close out our file on this inspection.

Very truly yours,

PARKER DIVISION
HOOKER CHEMICALS & PLASTICS CORPORATION



George J. Beyer
Technical Support Manager

GJB/so

PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

April 30, 1981

U.S. Environmental Protection Agency
Region V
RCRA Permits Branch
230 South Dearborn Street
Chicago, IL 60604

Re: EPA I.D. No. MID057676124

RECEIVED
MAY - 4 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Sirs:

In compliance with our requirements under RCRA, our facility submitted to your office before November 20, 1980 a RCRA Part A permit application which authorizes us to operate hazardous waste storage and treatment facilities under Interim Status regulations.

In the Federal Register of November 17, 1980 (45 FR 76074 et seq.) the EPA promulgated amendments that suspend the applicability of the RCRA hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of certain wastewater treatment and neutralization units. We believe that the promulgated amendments of November 17, 1980 suspend the applicability of the above RCRA hazardous waste regulations to our wastewater facility. We desire to have our Part A permit application amended to reflect the fact that as a consequence of the November 17, 1980 amendments we will only require a RCRA permit for hazardous waste storage.

Our rationale for the above belief is as follows:

The only hazardous waste treatment we conduct is the treatment of wastewaters in tanks associated with a system whose effluent water discharges to a POTW, and is subject to regulation under the pre-treatment requirements, (i.e. 307 (b)) of the Clean Water Act.

We would appreciate guidance from the Agency regarding the procedure we must follow to effect the subject amendment to our RCRA Part A permit application. If amended Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3) submissions will be required, we would appreciate the mailing of the subject blank forms to us.

We would also like to notify you of the merger on January 1, 1981 of Oxy Metal Industries Corporation into Hooker Chemicals & Plastics Corp. We are now The Parker Division, Hooker Chemicals & Plastics Corp.

Very truly yours,

George J. Beyer

George J. Beyer
Facility-Environmental Compliance Officer

GJB/so

OMI

MAY 10 4 1981

034

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards
122.7(i)

I. General Information:
(265.74)

(A) Facility Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.

(B) Street: 32100 STEPHENSON HWY.

(C) City: MADISON HTS. (D) State: MICHIGAN (E) Zip Code: 48071

(F) Phone: 313-583-9300 (G) County: OAKLAND

(H) Operator: PARKER DIVISION

(I) Street: 32100 STEPHENSON HWY.

(J) City: MADISON HEIGHTS (K) State: MICHIGAN (L) Zip Code: 48071

(M) Phone: 313-583-9300 (N) County: OAKLAND

(O) Owner: AS OF JAN 1, 1981, NOOKER CHEMICAL AND PLASTICS

(P) Street: 32100 STEPHENSON HWY.

(Q) City: MADISON HEIGHTS (R) State: MICHIGAN (S) Zip Code: 48071

(T) Phone: 313-583-9300 (U) County: OAKLAND

_____ Federal _____ Municipal X Private

(V) Type of Ownership: _____ State _____ County

(W) Date of Inspection: MARCH 11, 1981 (Q) Time of Inspection (From) 9:45 A.M. (To) 1:00 P.M.

(X) Weather Conditions: OVERCAST, NORTHERLY WINDS, COLD

(Y) Person(s) Interviewed	Title	Telephone
<u>MR. GEORGE BEYER</u>	<u>TECHNICAL SUPPORT MANAGER</u>	<u>313-583-9500</u>
<u>MR. ARTHUR KLEFEGEL</u>	<u>COMPANY LEGAL COUNSEL</u>	<u>313-583-9500</u>
(Z) Inspection Participants	Title	Telephone
<u>KEVIN TOLLIVER</u>	<u>ENGINEER - AIR QUALITY DIVISION</u>	<u>313-666-2700</u>
<u>SUSAN NORTON</u>	<u>WATER QUALITY SPECIALIST - WATER QUALITY DIVISION</u>	<u>313-379-9692</u>

II. Description of Site Activity

- | | |
|---|--|
| (A) <u> X </u> Generator (Form 2) | (B) <u> </u> Transporter (Form 3) |
| (C) <u> X </u> Chemical, Physical and Biological Treatment (Form 4) | (D) <u> X </u> Storage (Form 5) |
| (E) <u> * </u> Landfill (Form 6) | (F) <u> </u> Incineration (Form 7) |
| (G) <u> </u> Land Treatment (Form 4) | (H) <u> </u> Thermal Treatment (Form 7) |

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
122.4				

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? 265.12(a) <i>NOT APPLICABLE</i>				
2. Transfer of Ownership? 265.12(b)		<u>X</u>		
(B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	<i>FOR FILTER PRESS SLUDGE</i> <u>X</u>	<i>FOR MIXED LAB WASTE</i> <u>X</u>		
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility? 265.13(b)	<i>FOR FILTER PRESS SLUDGE</i> <u>X</u>	<u>X</u>		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c) <i>NOT APPLICABLE</i>				
(C) Security - Do security measures include: 265.14				
1. 24-Hour Surveillance? 265.14(b)1	<u>X</u>			
2. Artificial or Natural Barrier Around Facility? 265.14(b)2	<u>X</u>			
3. Controlled Entry? 265.14(b)2ii	<u>X</u>			
4. Danger Sign(s) at Entrance? 265.14(c)	<u>X</u>	<i>SIGNS ARE ON ORDER - AWAITING DELIVERY</i> <u>X</u>		
(D) Do Owner ^{or} Operator Inspections Include: 265.15				
1. Records of Malfunctions? 265.15(a)1	<u>X</u>			
2. Records of Operator Error? 265.15(a)1	<u>X</u>			
3. Records of Discharges? 265.15(a)1	<u>X</u>			
4. Inspection Schedule? 265.15(a)4	<u>X</u>			
5. Safety, Emergency Equipment? 265.15(b)1	<u>X</u>			
6. Security Devices? 265.15(b)1	<u>X</u>			
7. Operating and Structural Devices? <i>NOT APPLICABLE</i> 265.15(b)1	<u>X</u>			
8. Inspection Log? 265.15(d)	<u>X</u>			

111. GENERAL FACILITY STANDARDS - CONTINUED

Yes

No

N
Inspected

See Remark
Number

Do Personnel Training Records
Include:
265.16(d)

1. Job Titles?

2. Description of Training?

3. Records of Training?

Is Personnel Training Completed
within the Required Time Frame?

X

~~NOT FOR ADJACENT SHED~~

(F) Are the Following
Special Requirements for
Ignitable, Reactive, or
Incompatible Wastes Addressed?

265.17

1. Special Handling?

X

ON INSIDE

ON ORDER FOR
SHED

2. No Smoking Signs?

X

X

3. Separation and
Confinement?

X

IV. PREPAREDNESS AND PREVENTION - 265 Subpart C

(A) Maintenance and Operation
of Facility:

1. Is there any evidence of fire,
Explosion, or release of
hazardous waste or hazardous
waste constituent?

265.31

X

(B) Does the Facility have
the Following Equipment:
265.32

1. Alarm System?

X

NOT FOR
ADJACENT SHED

265.32(a)

2. Telephone or 2-Way Radios?

X

NOT FOR
ADJACENT SHED

265.32(b)

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

X

265.32(c)

Indicate the volume of water and/or foam available for fire control;

265.32(d)

Units: OVERHEAD SPRINKLER SYSTEM

CITY FIRE HYDRANT IN FRONT OF PREMISES

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment: 265.33 Recordkeeping required under 265.15(b)1				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Is Emergency Equipment Maintained in Operable Conditions?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Has Owner ^{or} Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(E) Is there Adequate Aisle Space for Unobstructed Movement? 265.35	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(F) Are Arrangements with Local Authorities Included in the Operating Record? 265.37	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

3-4 FEET - WIDTH OF AISLES

FIRE DEPARTMENT,
LOCAL MEDICAL
CLINIC

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart D

Does the Contingency Plan Contain the Following Information:

CONTINGENCY PLAN WAS IN PROGRESS OF BEING UPDATED ON MAR 11, 1981; SHOULD BE READY BY END OF MARCH 1981.

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

X

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? 265.52(d)		<i>WILL BE ADDED TO UPDATED CONTINGENCY PLAN</i> X		
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 265.52(e)	<i>HAVE LOG OF LOCATION OF FIRE EXTINGUISHERS, FIRE BLANKETS, ETC.</i> X	X		
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes:) 265.52(f)	X			
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations? 265.53		<i>PLAN BEING UPDATED</i> X		
(C) Emergency Coordinator 265.55				
1. Is the facility Emergency Coordinator identified?	X			
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?		<i>NOT APPLICABLE</i> X		

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING -265 Subpart E

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Are records of past shipments retained for 3 years? <i>NOT APPLICABLE</i> 265.71(5)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies? <i>NOT APPLICABLE</i> 265.72	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H

(A) Closure and Post Closure	<i>NOT APPLICABLE</i>			
1. Closure Plan Available for Inspection by May 19, 1981? 265.112(a)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
2. Has this plan been submitted to the Regional Administrator? 265.112(c)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3. Has Closure begun? 265.112(c)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4. Is closure cost estimate available by May 19, 1981? 265.142	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(B) Post Closure Care and Use of Property - Has the Owner ^{or} Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)? 265.117	<u> </u>	<u> </u>	<u> </u>	<u> </u>

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection
262

I. General Information:

(A) Installation Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 313 583 9300 (G) County: OAKLAND
(H) Operator: PARKER DIVISION
(I) Street: 32100 STEPHENSON HWY.
(J) City: MADISON HEIGHTS (K) State: MICHIGAN (L) Zip Code: 48071
(M) Phone: 313 583 9300 (N) County: OAKLAND
(O) Owner: AS OF JAN 1, 1981, HOOKER CHEMICAL & PLASTICS
(P) Street: 32100 STEPHENSON HWY.
(Q) City: MADISON HEIGHTS (R) State: MICHIGAN (S) Zip Code: 48071
(T) Phone: 313 583 9300 (U) County: OAKLAND
(V) Type of Ownership: ☐ Federal ☐ Municipal ☒ Private
☐ State ☐ County
(W) Date of Inspection: _____ Time of Inspection (From) 7:45 AM (To) 1:00 P.M.
(X) Weather Conditions: OVERCAST, NORTHERLY WINDS, COLD.

Telephone

313-583-7200

313 - 583-9300

Telephone

313-6206-2700

313-~~379~~-9697

(G) Comments:

Form 2 - Page 2

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available? 262.23(a)3	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the Manifest contain the following information:				
1. Manifest document number? 262.21(a)1	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Name, mailing address, telephone number, and EPA ID Number of Generator? 262.21(a)2	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
3. Name and EPA ID Number of Transporter(s)? 262.21(a)3	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
7. Required Certification? 262.21(b)	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
8. Required Signatures? 262.23(a)1	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42	<u> </u>	<u> </u>	<u>N/A</u>	<u> </u>

REPORT FORMS PREPARED
BUT HAVE NOT YET BEEN NEEDED.

IV. PRE-TRANSPORT REQUIREMENTS - 262 Subpart C

(A) Is Generator Packaging waste in accordance with DOT Regulations? 262.30 49 CFR Parts 173.178 and 179	<u>DOES NOT APPLY</u>	<u> </u>	<u> </u>	<u> </u>
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? 262.31 49 CFR Part 172	<u>DOES NOT APPLY</u>	<u> </u>	<u> </u>	<u> </u>
(C) If required, are placards available to transporter? 262.33 49 CFR Part 172 Subpart F	<u>NOT REQUIRED AS OF YET</u>	<u>X</u>	<u> </u>	<u> </u>

(D) Pre-shipment Accumulation:

Yes	No	Not Inspected	See Remark Number
-----	----	---------------	-------------------

- | | | | | |
|--|--|---|-------|-------|
| 1. Are containers marked with start of accumulation date?
262.34(a)3 | _____ | <u>X</u> | _____ | _____ |
| 2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?
262.34(a)1 If no, the facility must be <u>storage</u> or disposal facility 262.34(b) | _____ | <u>X</u> | _____ | _____ |
| 3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? | <u>COMPLIES W/ 50' LIMIT</u>
<u>X</u> | <u>WEEKLY INSPECTIONS NOT YET BEGUN</u>
<u>X</u> | _____ | _____ |
| 4. Are wastes stored in tanks managed according to the following: <i>NOT APPLICABLE</i> | _____ | _____ | _____ | _____ |
| a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? <i>NOT APPLICABLE</i>
265.192(b) | _____ | _____ | _____ | _____ |
| b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?
265.192(c) | _____ | _____ | _____ | _____ |
| c. Do continuous feed systems have a waste-feed cutoff?
265.192(d) | _____ | _____ | _____ | _____ |
| d. Are required daily and weekly inspections done?
265.194 | _____ | _____ | _____ | _____ |
| e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?
265.198, 265.17 | _____ | _____ | _____ | _____ |
| f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply)
265.199 | _____ | _____ | _____ | _____ |

If generator is also a MSD, omit section V

NOT APPLICABLE

	Yes	No	Not Inspected	See Remark Number
A. Do Personnel training records include: 265.16				
1. Job Titles? 265.16(d)1				
2. Description of Training? 265.16(d)3				
3. Records of Training? 265.16(d)4				
Is Personnel Training Completed within the Required Time Frame?				
B. Preparedness and Prevention 265 Subpart C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31				
2. Does the Facility have the following equipment?				
a. Alarm system? 265.32(a)				
b. Telephone or 2-Way Radios? 265.32(b)				
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)				
Indicate the volume of water and/or foam available for fire control 265.32(d)				
Units: _____				
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? 265.33				
b. Is emergency equipment Maintained in Operable Condition? 265.33				

4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?
265.34(a)
5. Is there adequate Aisle Space for unobstructed Movement?
265.35
6. Are arrangements with local authorities included in the operating record?
265.37

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.
265.52(d)

d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?
265.52(e)

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.
265.52(f)

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	_____	_____	_____	_____
3. Emergency Coordinator 265.55				
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years? *NOT APPLICABLE*
265.71(a)5

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?
262.50

x

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, *NOT APPLICABLE*
has a generator:
- a. Notified the Administrator in writing?
262.50(b)1
- b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

NOT APPLICABLE

Yes

No

Not
Inspected

See Remark
Number

c. Met the Manifest requirements? _____

262.50(b)3

2. Importing Hazardous Waste,
has the generator:

262.50(d)

a. Met the manifest requirements? _____

VIII. PREPARER INFORMATION

Name: SUSAN NORTON, WATER QUALITY SPECIALIST, WATER QUALITY DIVISION - 313-379-969

Title: KEVIN TOLLIVER, ENGINEER, AIR QUALITY DIVISION - 313 666 1500

Phone Number: _____

REMARKS: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection
(263)

NOT APPLICABLE

I. General Information:

(A) Transporter Name: _____

(B) Street: _____

(C) City: _____ (D) State: _____ (E) Zip Code: _____

(F) Phone: _____ (G) County: _____

(H) Operator: _____

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: _____

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Type of Ownership: _____ Federal _____ Municipal _____ Private
_____ State _____ County

(W) Date of Inspection: _____ Time of Inspection (From) _____ (To) _____

(X) Weather Conditions: _____

NOT APPLICABLE

(Y) Person(s) Interviewed

Title

Telephone

(Z) Inspection Participants

Title

Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) _____ Generator (Form 2)

(B) _____ Chemical, Physical and
Biological Treatment (Form 4)

(C) _____ Storage (Form 5)

(D) _____ Landfill (Form 6)

(E) _____ Incineration (Form 7)

(F) _____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

Yes

No

Not
Inspected

See Remark
Number

(A) Are Copies of the Completed
Manifest(s) or Shipping Paper(s)
Available for Review and
Retained for Three Years?

263.22(a)

NOT A CABLE

Yes

No

Not
Inspected

See Remark
Number

A. Does the Transporter Record on the
Manifest the Date the Waste left U.S?
263.20(f)1 ^{^the}

B. Are Completed Manifest(s) on File?—

→ SIGNED

263.22(a) and 263.20(f)2

V. MISCELLANEOUS

A. Does Transporter Transport
Hazardous Waste Into the
U.S. from Abroad?
263.10(c)1

B. Does the Transporter Mix
Hazardous Waste of Different
DOT Shipping Descriptions
by Placing them into a Single
Container?

263.10(c)2

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and
Must comply with the Generator Regulations.

263.10(c)

VI. PREPARER INFORMATION

A. Name: _____

Title: _____

Phone No.: _____

Remarks: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment
265 - Subpart Q

I. General Information

(A) Facility Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) Zip Code 48071
(F) Phone: 313-583-9300 (G) County: OAKLAND

ONLY LABORATORY WASTEWATER
IS TREATED BEFORE DISCHARGE TO
SANITARY SEWER

II. Chemical, Physical and Biological
Treatment (Subpart Q)

265

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	X			
3. Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13			NOT APPLICABLE	
4. Are inspection procedures followed according to 265.403?	X			
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	X		NOT APPLICABLE	NO REACTIVE OR IGNITABLE WASTE
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		PUT IN SYSTEM

III. Land Treatment (Subpart M) 265

NOT APPLICABLE

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation? 265.272(a)				
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3. Is waste analysis according to 265.273? and 265.13				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

265 - Subparts I, J, K, and L
I. General Information

(A) Facility Name: PARKER DIVISION, OXY METALS INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) ZIP Code 48071
(F) Date of Inspection: 3-13-83-9300

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I) 265

	YES	NO	NOT IN- SPECTED	REMARK #
1. Are containers in good condition? 265.171	X			
2. Are containers compatible with waste in them? 265.172	X			
3. Are containers stored closed? 265.173(a)	X			
4. Are containers managed to prevent leaks? 265.173(b)	X			
5. Are containers inspected weekly for leaks and defects? 265.174	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176	X			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)	X			
8. Are containers of incompatible wastes separated or protected from each other <u>physical barriers</u> or sufficient distance? 265.177(c)	X	X	NOT APPLICABLE	

B. Facilities which store hazardous waste in tanks (Subpart J) NOT APPLICABLE

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				

	YES	NO	NOT INSPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff? 265.192(d)				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193(a)				
5. Are required daily and weekly inspections done? 265.194				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.199				

NOT APPLICABLE

C. Facilities which store hazardous waste in surface impoundments (Subpart K) 265

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222				
2. Do earthen dikes have protective cover? 265.223				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225(a)				
4. Is the freeboard level inspected at least daily? 265.226(a)1				
5. Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.299(a)1				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				

D. Facilities which store hazardous waste in waste piles (Subpart L) 265 *NOT APPLICABLE*

1. Are waste piles covered or protected from the wind? 265.251				
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.) 265.253				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256(a)1				

Continued on next page

NOT APPLICABLE

	YES	NO	NOT INSPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected? 265.256(a)?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)				
7. Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N
NOT APPLICABLE

I. General Information

(A) Facility Name: _____
(B) Street: _____
(C) City: _____ (D) State: _____ (E) Zip Code: _____
(F) Date of Inspection: _____

II. Landfills

Yes No Not Inspected See Remark Number

(A) General Operating Requirements -
Does the facility provide the following:

- *1. Diversion of run-on away from active portions of the fill? 265.302(a)
- *2. Collection of run-off from active portions of the fill? 265.302(b)
- *3. Is collected run-off treated? 265.302(b)
- 4. Control of wind disposal of hazardous waste? 265.302(d)

(* Effective 11-19-81)

(B) Surveying and Recordkeeping -
Does the Operating Record Include:

- 1. A map showing the exact location and dimensions of each cell? 265.309(a)
- 2. The contents of each cell and the location of each hazardous waste type within each cell? 265.309(b)

NOT APPLICABLE

Yes

No

Not
Inspected

See Remark
Number

C. Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81?
265.112(a)
2. Has this plan been submitted to the Regional Administrator?
265.112(c)
3. Has Closure begun?
265.112(c)
4. Is Closure cost estimate available by 5-19-81?
265.142(a)

D. Special requirements for ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.312

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

E. Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?
265.313

If not, the provisions of 40 CFR 265.17(b) apply.

F. Special Requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?
265.314(a)
2. Does the landfill have a chemically and physically resistant liner system?
265.314(a)1

T APPLICABLE

	Yes	No	Not Inspected	See Remark Number
3. Does the landfill have a functional leachate collection system? 265.314(a)1	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2	_____	_____	_____	_____
G. Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? 265.315(a)	_____	_____	_____	_____

11/6/80

265.11

RCRA INSPECTION REPORT-INTERIM STATUS STANDARDS
 - FORM 7 SUPPLEMENTAL FORM FOR THERMAL TREATMENT (AND INCINERATORS)
 265 - Subparts P and O
 NOT APPLICABLE

I. General Information

(A) Facility Name: _____
 (B) Street: _____
 (C) City: _____ (D) State: _____ (E) Zip Code: _____
 (F) Date of Inspection: _____

II. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition: I 265.343 Th 265.373

**** Was this component at SS prior to adding waste?

Component	Yes	No	Not Inspected	See Remark #:
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. Waste Analysis

265.13

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:

I TH
 265.345 265.375

Yes No Not Inspected See Remark #:

a. Heating value

b. Halogen content

c. Sulfur content

2. Documented, written data may be substituted for analysis for these. Are either present for:

I Th
a. Lead? 265.345 265.375

b. Mercury?

Yes No Not Inspected See Remark #:

- B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

See Remark #:

1. _____
2. _____
3. _____
4. _____
5. _____

IV. Monitoring and Inspections

- | | Yes | No | Not Insp. | See Remark #: |
|--|-------|-------|-----------|---------------|
| A. Combustion/emission control instruments monitored at least every 15 minutes?
I 265.347(a)1 Th 265.377(a)1 | _____ | _____ | _____ | _____ |
| B. Steady state maintained or corrections attempted?
I 265.347(a)1 Th 265.377(a)1 | _____ | _____ | _____ | _____ |
| C. Stack plume observed at least hourly for normal color and opacity?
I 265.347(a)2 Th 265.377(a)2 | _____ | _____ | _____ | _____ |
| D. Did any stack observations made by owner or operator show a plume different than normal?* | _____ | _____ | _____ | _____ |
| I 265.347(a)2 Th 265.377(a)2 | _____ | _____ | _____ | _____ |
| E. If yes to D above, were corrections made to return emissions to normal appearance?* | _____ | _____ | _____ | _____ |
| I 265.347(a)2 Th 265.377(a)2 | _____ | _____ | _____ | _____ |
| F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?
I 265.347(a)3 Th 265.377(a)3 | _____ | _____ | _____ | _____ |
| G. Emergency shutdown controls, system alarms checked daily for proper operation?
I 265.347(a)3 Th 265.377(a)3 | _____ | _____ | _____ | _____ |

Specify in Remarks for what period of time this was checked.

V. Open Burning *NOT APPLICABLE*

Only complete this part if the facility open burns hazardous waste.

- | | Yes | No | Not Inspected | See Remark #: |
|---|-------|-------|---------------|---------------|
| 1. Does this facility burn <u>only</u> waste explosives?
(A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.) 265.382 | _____ | _____ | _____ | _____ |
| 2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)? 265.382 | _____ | _____ | _____ | _____ |

Inspector(s): Sharon Norton, WATER QUALITY DIVISION, D.N.R. (Sign and Date)

Kevin L. Toliver, AIR QUALITY MARCH 11, 1981

265.382

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

034

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards
122.7(i)

I. General Information:
(265.74)

(A) Facility Name: PARKER DIVISION - Dry Metal L. Division
(B) Street: 32100 STEPHENSON Hwy
(C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 583-9300 (G) County: OAKLAND

(H) Operator: PARKER DIVISION
(I) Street: 32100 STEPHENSON Hwy
(J) City: ROYAL OAK (K) State: MICHIGAN (L) Zip Code: 48071
(M) Phone: 583-9300 (N) County: OAKLAND

(O) Owner: HOOVER CHEMICAL AND PLASTICS
(P) Street: 32100 STEPHENSON Hwy
(Q) City: ROYAL OAK (R) State: MICHIGAN (S) Zip Code: 48071
(T) Phone: 583-9300 (U) County: OAKLAND

(V) Type of Ownership: ☐ Federal ☐ Municipal ☒ Private
☐ State ☐ County

(W) Date of Inspection: 03-11-81 (Q) Time of Inspection (From) 10:00 (To)

(X) Weather Conditions: OVERCAST NORTH WINDS 10-15 MPH

(Y) Person(s) Interviewed	Title	Telephone
<u>GEORGE BEVER</u>	<u>TECHNICAL SUPPORT MGR.</u>	<u>683-1111</u>
<u>ARTHUR KLUEGEL</u>	<u>ATTORNEY</u>	<u>583-9111</u>
(Z) Inspection Participants	Title	Telephone
<u>KEVIN L. TOLLIVER</u>	<u>ENGINEER - A&D</u>	<u>(313) 666-2700</u>
<u>SEE NORTON</u>	<u>WATER QUAL SPEC - W&D</u>	<u>(313) 379-9692</u>

II. Description of Site Activity

- | | |
|--|--|
| (A) <input checked="" type="checkbox"/> Generator (Form 2) | (B) <input type="checkbox"/> Transporter (Form 3) |
| (C) <input checked="" type="checkbox"/> Chemical, Physical and Biological Treatment (Form 4) | (D) <input checked="" type="checkbox"/> Storage (Form 5) |
| (E) <input type="checkbox"/> Landfill (Form 6) | (F) <input type="checkbox"/> Incineration (Form 7) |
| (G) <input type="checkbox"/> Land Treatment (Form 4) | (H) <input type="checkbox"/> Thermal Treatment (Form 7) |

(I) Comments: PAPER QUALITY MATERIALS TWO UPSTREAM - 1) FINE
FILTER PRESS SLOUGH AND 2) THERMALLY LAB WASTE
THEY AREN'T A TREATING FACILITY IN THE STRICT SENSE. THEY TREAT
THEIR LAB WASTEWATER BEFORE DISCHARGING IT TO THE SEWER SYSTEM.

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

122.4

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? 265.12(a)			NOT APPLICABLE	1
2. Transfer of Ownership? 265.12(b)		✓		
(B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	FILTER PRESS SLUDGE WASTE X	MIXED LAB WASTE X		2
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility? 265.13(b)	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)			NOT APPLICABLE	3
(C) Security - Do security measures include: 265.14				
1. 24-Hour Surveillance? 265.14(b)1 ^{OR}	X	A.D.T. SYSTEM		
2. Artificial or Natural Barrier Around Facility? 265.14(b)2 ^{OR}	X			
3. Controlled Entry? 265.14(b)2ii	X			
4. Danger Sign(s) at Entrance? 265.14(c)		X	AWAITING DELIVERY.	4
(D) Do Owner ^{or} Operator Inspections Include: 265.15				
1. Records of Malfunctions? 265.15(a)1	X			
2. Records of Operator Error? 265.15(a)1	X			
3. Records of Discharges? 265.15(a)1	X			
4. Inspection Schedule? 265.15(a)4	X			
5. Safety, Emergency Equipment? 265.15(b)1	X			
6. Security Devices? 265.15(b)1	X			
7. Operating and Structural Devices? 265.15(b)1			NOT APPLICABLE	5
8. Inspection Log? 265.15(d)	X		THE FACILITY HAS A CONTROLLED ENTRY AND DISCHARGE	

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include: 265.16(d)				
1. Job Titles?		X		
1a) Job Description				
2. Description of Training?		X		
3. Records of Training?		X		
Is Personnel Training Completed within the Required Time Frame?	X			
4. written descrip of training req'd for each job.				
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed? 265.17				
1. Special Handling?	X			
2. No Smoking Signs?	BUILDING INTERIOR X	ON ORDER FOR SIGNS X		6
3. Separation and Confinement?	X			

IV. PREPAREDNESS AND PREVENTION - 265 Subpart C

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent? 265.31		X		
Does the Facility have the Following Equipment: 265.32				
1. Alarm System? 265.32(a)	X	FIRE SHED X		7
2. Telephone or 2-Way Radios? 265.32(b)	X	FIRE SHED X		8
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)	X			
Indicate the volume of water and/or foam available for fire control: 265.32(d)				
Units:	STANDARD FIRE HYDRANT IN FRONT OF FACILITY			
	OVERHEAD SPRINKLERS			

Yes	No	Not Inspected	See Remark Number
-----	----	---------------	-------------------

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? 265.52(d)		X	THIS INFORMATION WILL BE ON UPDATED PLAN
--	--	---	--

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 265.52(e)		X	
--	--	---	--

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 265.52(f)	X		
--	---	--	--

(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations? 265.53		X	COPIES AVAILABLE SOUN.
---	--	---	------------------------

(C) Emergency Coordinator
265.55

1. Is the facility Emergency Coordinator identified?	X		
--	---	--	--

2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	X		
---	---	--	--

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X		
---	---	--	--

(D) Emergency Procedures If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?			NOT APPLICABLE 7
--	--	--	------------------

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment: 265.33 Recordkeeping required under 265.15(b)1				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Is Emergency Equipment Maintained in Operable Conditions?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Has Owner ^{or} Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(E) Is there Adequate Aisle Space for Unobstructed Movement? 265.35	<u>X</u>	<u>3-4 FT unobstr. aisles</u>	<u> </u>	<u> </u>
(F) Are Arrangements with Local Authorities Included in the Operating Record? 265.37	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

V . CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart D

(*) Does the Contingency Plan Contain the Following Information:

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)

X

IS BEING UPDATED
CONVENE TO TRAIN IT BY 11/13

2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING -265 Subpart E

	Yes	No	Not Inspected	See Remark Number
A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	X			
2. Are records of past shipments retained for 3 years? 265.71(5)	X		NOT APPLICABLE	10
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies? 265.72			NOT APPLICABLE	11
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	X			
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	X			

Appx 133252

VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H

NOT APPLICABLE				
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981? 265.112(a)				
2. Has this plan been submitted to the Regional Administrator? 265.112(c)				
3. Has Closure begun? 265.112(c)				
4. Is closure cost estimate available by May 19, 1981? 265.142				
(B) Post Closure Care and Use of Property - Has the Owner/Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)? 265.117				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection
262

I. General Information:

(A) Installation Name: PARKER DIVISION, GAYMETAL INDUSTRIES
 (B) Street: 32100 STEPHENSON HWY.
 (C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071
 (F) Phone: 583-9300 (G) County: OAKLAND
 (H) Operator: PARKER DIVISION
 (I) Street: 32100 STEPHENSON HWY.
 (J) City: ROYAL OAK (K) State: MICHIGAN (L) Zip Code: 48071
 (M) Phone: 583-9300 (N) County: OAKLAND
 (O) Owner: HOOVER CHEMICAL AND PLASTICS
 (P) Street: 32100 STEPHENSON HWY.
 (Q) City: ROYAL OAK (R) State: MICHIGAN (S) Zip Code: 48071
 (T) Phone: 583-9300 (U) County: OAKLAND
 _____ Federal _____ Municipal X Private
 (V) Type of Ownership: _____ State _____ County
 (W) Date of Inspection: 03-11-81 Time of Inspection (From) 7:00 AM (To) 1:00 PM
 (X) Weather Conditions: OVERCAST, NORTH WINDS, COLD

Telephone

190 - 73000

1583 - 7300

Telephone

(312) 666-2700

(30) 379-769.2

(G) Comments:

Form 2 - Page 2

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available? 262.23(a)3	X			
(B) Does the Manifest contain the following information:				
1. Manifest document number? 262.21(a)1	X			
2. Name, mailing address, telephone number, and EPA ID Number of Generator? 262.21(a)2				
3. Name and EPA ID Number of Transporter(s)? 262.21(a)3				
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4				
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203				
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6				
7. Required Certification? 262.21(b)				
8. Required Signatures? 262.23(a)1				
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42				

12
THESE ITEMS HAVE BEEN VERIFIED IN THE OFFICE FOR THE INFORMATION IS CORRECT THROUGH.

CO. HAS THESE REPORTS
ALTHOUGH THEY HAVEN'T HAD CAUSE
TO DO THEM.

IV. PRE-TRANSPORT REQUIREMENTS - 262 Subpart C

— NOT APPLICABLE AS YET —

(A) Is Generator Packaging waste in accordance with DOT Regulations? 262.30 49 CFR Parts 173.178 and 179				13
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? 262.31 49 CFR Part 172				
(C) If required, are placards available to transporter? 262.33 49 CFR Part 172 Subpart F		X		

Yes	No	Not Inspected	See Remark Number
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7) Pre-shipment Accumulation:

- | | | | | |
|--|---|---|--|--|
| 1. Are containers marked with start of accumulation date?
262.34(a) | | X | | |
| 2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?
262.34(a) If no, the facility must be storage or disposal facility 262.34(b) | | X | | |
| 3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? | X | | | THE WEEKLY INSPECTIONS HAVE NOT YET STARTED. |
| 4. Are wastes stored in tanks managed according to the following: | | | | STORAGE IS ONLY IN DRUMS - NOT APPLICABLE - |
| a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?
265.192(b) | | | | 14 |
| b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?
265.192(c) | | | | |
| c. Do continuous feed systems have a waste-feed cutoff?
265.192(d) | | | | |
| d. Are required daily and weekly inspections done?
265.194 | | | | |
| e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?
265.198, 265.17 | | | | |
| f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)
265.199 | | | | |

If generator is also SD, omit section V

	Yes	No	Not Inspected	See Remark Number
Do Personnel training records include: 265.16				
1. Job Titles? 265.16(d)1				
2. Description of Training? 265.16(d)3				
3. Records of Training? 265.16(d)4				
Is Personnel Training Completed within the Required Time Frame?				
B. Preparedness and Prevention 265 Subpart C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31				
2. Does the Facility have the following equipment?				
a. Alarm system? 265.32(a)				
b. Telephone or 2-Way Radios? 265.32(b)				
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)				
Indicate the volume of water and/or foam available for fire control 265.32(d)				
Units: _____				
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? 265.33				
b. Is emergency equipment Maintained in Operable Condition? 265.33				

Yes

No

Not
InspectedSee Remark
Number

4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?
265.34(a)
5. Is there adequate Aisle Space for unobstructed Movement?
265.35
6. Are arrangements with local authorities included in the operating record?
265.37

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)

_____	_____	_____	_____
-------	-------	-------	-------

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

_____	_____	_____	_____
-------	-------	-------	-------

c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.
265.52(d)

_____	_____	_____	_____
-------	-------	-------	-------

d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?
265.52(e)

_____	_____	_____	_____
-------	-------	-------	-------

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.
265.52(f)

_____	_____	_____	_____
-------	-------	-------	-------

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	_____	_____	_____	_____
3. Emergency Coordinator 265.55				1
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?
265.71(a)5

NOT APPLICABLE AS YET

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?
262.50

X

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, has a generator:
- Notified the Administrator in writing?
262.50(b)1
 - Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
262.50(b)2

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements? 262.50(b)3	_____	_____	_____	_____
2. Importing Hazardous Waste, has the generator: 262.50(d)	_____	_____	_____	_____
a. Met the manifest requirements?	_____	_____	_____	_____

VIII. PREPARER INFORMATION

Name: KEVIN L. TOLLIVER

Title: AIR QUALITY ENGINEER

Phone Number: (313) 666-2700

MARKS: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection
(263)

I. General Information:

(A) Transporter Name: _____

(B) Street: _____

(C) City: _____ (D) State: _____ (E) Zip Code: _____

(F) Phone: _____ (G) County: _____

(H) Operator: _____

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: _____

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Type of Ownership: _____ Federal _____ Municipal _____ Private
_____ State _____ County

(W) Date of Inspection: _____ Time of Inspection (From) _____ (To) _____

(X) Weather Conditions: _____

(Y) Person(s) Interviewed

Title

Telephone

(Z) Inspection Participants

Title

Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) _____ Generator (Form 2)

(B) _____ Chemical, Physical and
Biological Treatment (Form 4)

(C) _____ Storage (Form 5)

(D) _____ Landfill (Form 6)

(E) _____ Incineration (Form 7)

(F) _____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

	Yes	No	Not Inspected	See Remark Number
(A) Are Copies of the Completed Manifest(s) or Shipping Paper(s) Available for Review and Retained for Three Years? 263.22(a)	_____	_____	_____	_____

Yes

No

Not
Inspected

See Remarks
Number

Does the Transporter Record on the
Manifest the Date the Waste left U.S.?
263.20(f)1 ^{^the}

B. Are Completed Manifest(s) on File? —

→ SIGNED

263.22(a) and 263.20(f)2

V. MISCELLANEOUS

A. Does Transporter Transport
Hazardous Waste Into the
U.S. from Abroad?
263.10(c)1

B. Does the Transporter Mix
Hazardous Waste of Different
DOT Shipping Descriptions
by Placing them into a Single
Container?

263.10(c)2

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and
Must comply with the Generator Regulations.

263.10(c)

VI. PREPARER INFORMATION

A. Name: _____

Title: _____

Phone No.: _____

Remarks: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment
265 - Subpart Q

I. General Information

(A) Facility Name: PAPER DIVISION, CHRYSLER INDUSTRIES
(B) Street: 32100 STEPHENSON HWY.
(C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 583-9300 (G) County: OAKLAND

II. Chemical, Physical and Biological
Treatment (Subpart Q)
265

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	X			
3. Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13			NOT APPLICABLE	16
4. Are inspection procedures followed according to 265.403?	X			
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	X		NO REACTIVE WASTES INVOLVED IN PROCESS	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		17

WASTES ONLY TREATED THROUGH LAND TREATMENT. WASTES WERE RELEASED TO MUNICIPAL SANITARY SEWER. THIS FACILITY IS A REPAIR SHOP.
Form 4 -Page 1

NOT APPLICABLE

III. Land Treatment (Subpart M) 265

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation? 265.272(a)				1
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3. Is waste analysis according to 265.273? and 265.13				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

265 - Subparts I, J, K, and L
I. General Information

) Facility Name: PARYCE DIVISION - OXYMETAL INDUSTRIES
) Street: 32100 STEPHENSON HWY
) City: ROYAL OAK (D) State: MICHIGAN (E) ZIP Code 48071
) Date of Inspection: 03-11-81

II. Storage Facility Standards (Part 265)

1. Facilities which store containers of hazardous waste (Subpart I) 265

	YES	NO	NOT IN- SPECTED	REMARK #
1. Are containers in good condition? 265.171	X			
2. Are containers compatible with waste in them? 265.172	X			
3. Are containers stored closed? 265.173(a)	X			
4. Are containers managed to prevent leaks? 265.173(b)	X			
5. Are containers inspected weekly for leaks and defects? (AND RECORDED IN LOGS?) 265.174	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176	X			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)	X			
8. Are containers of incompatible wastes separated or protected from each other by physical barriers or sufficient distance? 265.177(c)		X	NOT APPLICABLE	

3. Facilities which store hazardous waste in tanks (Subpart J) NOT APPLICABLE

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				

Do continuous feed systems have waste-feed cutoff?	265.192			
Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193(a)			
Are required daily and weekly inspections done?	265.194			
Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198			
Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.199			

Facilities which store hazardous waste in surface impoundments (Subpart K) 265

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	265.222			
2. Do earthen dikes have protective cover?	265.223			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	265.225(a)			
4. Is the freeboard level inspected at least daily?	265.226(a)1			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	265.226(a)2			
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.299(a)1			
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.230			

Facilities which store hazardous waste in waste piles (Subpart L) 265

1. Are waste piles covered or protected from the wind?	265.251			
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	265.252			
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	265.253			
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.256(a)1			

Continued on next page

			SPECTED	
5. Are piles of reactive or igni ble waste protected? 265.256(a)?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)				
7. Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

MID 057676-124

Yes	No	Not Inspected	See Remarks Number
-----	----	---------------	--------------------

C. Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81?
265.112(a)
2. Has this plan been submitted to the Regional Administrator?
265.112(c)
3. Has Closure begun?
265.112(c)
4. Is Closure cost estimate available by 5-19-81?
265.142(a)

D. Special requirements for ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.312

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

E. Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?
265.313

If not, the provisions of 40 CFR 265.17(b) apply.

F. Special Requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?
265.314(a)
2. Does the landfill have a chemically and physically resistant liner system?
265.314(a)1

11/6/80

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N

I. General Information

(A) Facility Name: _____
(B) Street: _____
(C) City: _____ (D) State: _____ (E) Zip Code: _____
(F) Date of Inspection: _____

	<u>II. Landfills</u>	Yes	No	Not Inspected	See Remark Number
(A) General Operating Requirements - Does the facility provide the following:					
*1. Diversion of run-on away from active portions of the fill? 265.302(a)		_____	_____	_____	_____
*2. Collection of run-off from active portions of the fill? 265.302(b)		_____	_____	_____	_____
*3. Is collected run-off treated? 265.302(b)		_____	_____	_____	_____
4. Control of wind dispersal of hazardous waste? 265.302(d) <i>dispersal</i>		_____	_____	_____	_____
(* Effective 11-19-81)					

(B) Surveying and Recordkeeping -
Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? 265.309(a) _____
2. The contents of each cell and the location of each hazardous waste type within each cell? 265.309(b) _____

	Yes	No	Not Inspected	See Remark Number
3. Does the landfill have a functional leachate collection system? 265.314(a)1	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2	_____	_____	_____	_____
G. Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? 265.315(a)	_____	_____	_____	_____

11/6/80